

Exhibit 2

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;*

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF THOMSON
DEFENDANTS' MOTION TO COMPEL
INTERROGATORY RESPONSES AND
DOCUMENT PRODUCTION**

Judge: Hon. Samuel Conti

Special Master: Hon. Vaughn R. Walker

1 *Costco Wholesale Corporation v.*
2 *Technicolor SA, et al., No. 13-cv-05723;*

3 *P.C. Richard & Son Long Island*
4 *Corporation, et al. v. Technicolor SA, et al.,*
No. 31:cv-05725;

5 *Schultze Agency Services, LLC, o/b/o*
6 *Tweeter Opco, LLC, et al. v. Technicolor SA,*
Ltd., et al., No. 13-cv-05668;

7 *Sears, Roebuck and Co. and Kmart Corp. v.*
8 *Technicolor SA, No. 3:13-cv-05262;*

9 *Target Corp. v. Technicolor SA, et al., No.*
10 *13-cv-05686*

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
al., No. 13-cv-00157

12 *Sharp Electronics Corp., et al. v. Hitachi,*
13 *Ltd., et. al., No. 13-cv-01173*

14 *ViewSonic Corporation v. Chunghwa Corp.,*
15 *et al., No. 14-cv-02510*

1 I, Jeffrey S. Roberts, hereby declare as follows:

- 2 1. I am an attorney with the law firm of Faegre Baker Daniels, LLP and one of the
3 attorneys representing Thomson Consumer Electronics, Inc. and Thomson SA
4 (collectively, the “Thomson Defendants”). I submit this Declaration in support of the
5 Thomson Defendants’ Motion to Compel Interrogatory Responses and Document
6 Production (“Motion”).
- 7 2. In my capacity as counsel for the Thomson Defendants, I have personal knowledge of
8 the discovery requests, discovery responses, and efforts to obtain discovery at issue in
9 the Motion. I have personal knowledge of the facts set forth in this Declaration and
10 could and would competently testify to those facts if called as a witness.
- 11 3. I certify that the Thomson Defendants met and conferred with DAPs in an effort to
12 resolve discovery disputes. These efforts were partially successful, but the parties
13 reached impasses as to the issues set forth in the Motion and now require intervention
14 from the Court. Attached hereto as Exhibit 1 is a true and a correct copy of an August
15 28, 2014, letter from my firm to counsel for DAPs summarizing the results of our
16 meeting to try to resolve, among other things, the disputes at issue in the Motion related
17 to the Thomson Defendants first sets of interrogatories and requests for production.
18 Attached as Exhibit 2 is a true and correct copy of a September 9, 2014 letter from my
19 firm to counsel for DAPs that, among other things, sets forth the scope of the Thomson
20 Defendant’s motion to compel.
- 21 4. In light of the complexity of the case and the number of parties from whom the
22 Thomson Defendants seek to compel information and documents, in most instances I
23 have attached excerpts of the relevant discovery materials in an effort to focus on the
24 primary disputes between the parties and avoid inundating the Court with unnecessary
25 material. The Thomson Defendants will, upon request, provide full copies of any exhibit
26 attached hereto or otherwise required by the Court.
- 27 5. In their September 5, 2014 Responses and Objections to Thomson SA and Thomson
28 Consumer Electronics, Inc.’s First Set of Requests for Admission, the DAPs all admitted
the following Requests for Admission: (1) Admit that You have no Evidence that

1 Thomson SA manufactured or sold CDTs during the Relevant Period; (2) Admit that
2 You have no Evidence that SA manufactured or sold CDT Products during the Relevant
3 Period; (3) Admit that You have no Evidence that Thomson Consumer manufactured or
4 sold CDTs during the Relevant Period; (4) Admit that You have no Evidence that
5 Thomson Consumer manufactured or sold CDT Products during the Relevant Period.

6 6. Attached hereto as Exhibit 3 is a true and correct copy of Thomson SA and Thomson
7 Consumer Electronics, Inc.'s First Set of Interrogatories to Electrograph Systems, Inc.
8 and Electrograph Technologies Corp. All DAPs that are the subject of this Motion
9 received a substantively identical set of interrogatories, except that Sharp's set omitted
10 Interrogatory No. 16 because it included claims against the Thomson Defendants in its
11 original complaint.

12 7. Attached hereto as Exhibit 4 is a true and correct copy of Thomson SA and Thomson
13 Consumer Electronics Inc.'s First Set of Requests for Production of Documents to
14 Electrograph Systems, Inc. and Electrograph Technologies Corp. All DAPs received
15 substantively the same set of requests for production.

16 8. Attached hereto as Exhibits 5–18 are true and correct copies of the relevant excerpts of
17 the following DAPs' answers and objections to the Thomson Defendants' First Set of
18 Interrogatories:

19 a. Exhibit 5: ABC Appliance, Inc.'s Objections and Responses to Thomson
20 SA and Thomson Consumer Electronics, Inc.'s First Set of Interrogatories.

21 b. Exhibit 6: Electrograph Systems Inc. and Electrograph Technologies
22 Corp.'s Objections and Responses to Thomson SA and Thomson Consumer
23 Electronics, Inc.'s First Set of Interrogatories.

24 c. Exhibit 7: Interbond Corporation of America's Objections and Responses to
25 Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of
26 Interrogatories.

27 d. Exhibit 8: MARTA Cooperative of America, Inc.'s Objections and
28 Responses to Thomson SA and Thomson Consumer Electronics, Inc.'s First
Set of Interrogatories.

- e. Exhibit 9: Office Depot, Inc.’s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- f. Exhibit 10: P.C. Richard & Son Long Island Corporation’s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- g. Exhibit 11: Schultze Agency Services, LLC’s (“Tweeter”) Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- h. Exhibit 12: Best Buy Co., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., BestBuy.com, L.L.C., and Magnolia Hi-Fi, Inc.’s (“Best Buy’s”) Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- i. Exhibit 13: Costco Wholesale Corporation’s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- j. Exhibit 14: Plaintiff Sears, Roebuck and Co. & Kmart Corp.’s Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- k. Exhibit 15: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.’s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.
- l. Exhibit 16: Responses and Objections of Alfred H. Siegel, as trustee of the Circuit City Stores, Inc. Liquidating Trust, to First Set of Interrogatories of Thomson SA and Thomson Consumer Electronics, Inc.’s.
- m. Exhibit 17: Plaintiff Target Corp.’s Responses and Objections to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s First Set of Interrogatories.

n. Exhibit 18: Tech Data Corporation and Tech Data Product Management, Inc.'s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Interrogatories.

9. Attached hereto as Exhibits 19–26 are true and correct copies of the relevant excerpts of the following DAPs responses and objections to the Thomson Defendants' First Set of Requests for Production of Documents:

a. Exhibit 19: Electrograph Systems, Inc., Electrograph Technologies, Corp., Office Depot, Inc., Interbond Corporation of America, P.C. Richard & Song Long Island Corporation, MARTA Cooperative of America, Inc., ABC Appliance, Inc., and Schultze Agency Services, LLC ("Tweeter")'s Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

b. Exhibit 20: Best Buy's Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

c. Exhibit 21: Costco Wholesale Corporation's Buy's Objections and Responses to Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

d. Exhibit 22: Plaintiffs Sears, Roebuck and Co. & Kmart Corp.'s Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

e. Exhibit 23: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s Objections and Responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

f. Exhibit 24: Responses and Objections of Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust, to First Request for Production of Documents from Thomson SA and Thomson Consumer Electronics, Inc.

g. Exhibit 25: Plaintiff Target Corp's Responses and Objections to Defendants

Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

h. Exhibit 26: Tech Data Corporation and Tech Data Product Management, Inc.'s Responses and Objections to Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Production of Documents.

10. Attached hereto as Exhibits 27–29 are true and correct excerpts from the following Rule 30(b)(6) depositions:

a. Exhibit 27: May 22, 2014, Deposition of Brian R. Stone, as 30(b)(6) designee of Best Buy (Designated “Highly Confidential”).

b. Exhibit 28: June 4, 2014, Deposition of Geoffrey Shavey, as 30(b)(6) designee of Costco Wholesale Corporation. (Designated “Highly Confidential”).

c. Exhibit 29: July 18, 2014, Deposition of James A. Smith, as 30(b)(6) designee of Kmart Corporation. (Designated “Highly Confidential”).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of September, 2014 in Denver, CO.

/s/ Jeffrey S. Roberts

Jeffrey S. Roberts

Exhibit 1

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VIA ELECTRONIC MAIL

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Re: *In re: CRT Antitrust Litigation*, 3:07-cv-5944-SC MDL No. 1917 (N.D. Cal.).

Dear Counsel:

Thank you for taking the time to speak with us yesterday regarding your objections and responses to the Thomson Defendants' First Set of Interrogatories and Requests for Production. We understood that the following attorneys were on the call, indicating representation of all of the Direct Action Plaintiffs ("DAPs") to whom we tendered deficiency letters: Astor Heaven, Laura Nelson, Nicholas Hesterberg, Kyle Smith, Jonathan Ross, Jalaine Garcia, Blaise Warren, and counsel for Tech Data. We write to memorialize our discussion and further explain our position. Please let us know if you disagree with any part of our summary of what was discussed during the call.

Counsel for DAPs

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We began the call by noting the difficulty of conducting a meet and confer simultaneously with all the DAPs, but stated that we were willing to attempt this approach at the DAPs' request, while reserving our rights to conduct, if necessary, additional follow up calls with individual DAPs. Because all the DAPs' responses and objections to the Thomson Defendants' First Set of Interrogatories and Requests for Production are very similar, if not identical in many instances, we proposed that we use the Electrograph Plaintiffs' objections and responses as a model for our discussions and address any variations in individual DAPs' responses and objections as necessary. Thus, the numbered references below to interrogatories and requests for production are to those we served on Electrograph. DAPs agreed they would make the appropriate connections to the analogous interrogatory and request for production served on them. No DAP objected to this approach. We then proceeded to discuss the Electrograph Plaintiffs' objections, answers and responses to the following interrogatories and requests for production contained in the Thomson Defendants' First Set of Interrogatories and Requests for Production:

Interrogatory Answers

Interrogatory No. 9: This interrogatory seeks the identity of individuals who negotiated or approved the purchase of CRTs from the Thomson Defendants. We explained that the DAPs' answers to this interrogatory simply reference prior discovery responses they have previously provided to other defendants, but, as required by Rule 33(d), do not identify specific, responsive documents produced by the parties. Thus, we explained that we do not believe the DAPs' answers enable us to identify the specific documents in which information that responds to this interrogatory may be found. We asked you to at the very least supplement your answers by identifying responsive documents by Bates number. Kyle Smith, on behalf of those DAPs represented by Boies Schiller & Flexner, LLP, responded by representing that all the DAPs' prior discovery responses to other defendants had been provided to the Thomson Defendants as part of the DAPs' initial disclosures and that documents referred to in those responses, including organizational charts, were responsive to Interrogatory No. 9. Mr. Smith offered to forward those discovery responses to us. Mr. Smith also stated that to the extent his clients were relying on the procedures set forth in Fed. R. Civ. P 33(d) to respond to Interrogatory No. 9, he did not agree that that rule required the DAPs to identify the specific Bates number of documents that contained information responsive to the interrogatory. We then asked whether it was the DAPs' position that their initial disclosures tell us who negotiated and approved sales from the Thomson Defendants. Mr. Smith initially responded that he did not believe the DAPs' are obligated to identify separate individuals who negotiated with the Thomson Defendants. Mr. Smith and counsel for other DAPs went on to explain, however, that they do not believe that their clients had individual buyers assigned to individual defendants, and that buyers were generally assigned based on product category or product size. Counsel for Circuit City and Sears/Kmart referred us to testimony from their Rule 30(b)(6) depositions.

While we acknowledge that some responsive information may be contained in the voluminous responses to other defendants' discovery requests, we do not accept your position that non-specific references to the DAPs' initial disclosures and prior discovery responses is an adequate answer to Interrogatory No. 9. We therefore demand that you supplement your answers to Interrogatory No. 9 with, at a minimum, specific references to the prior interrogatory answers or documents (by Bates number) where your answer may be found. Moreover, based on your representation that the DAPs' did

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not assign particular employees to the accounts of specific defendants, including the Thomson Defendants, we ask that you supplement your interrogatory answers with verified answers confirming the accuracy of these representations. We understand that some DAPs did not purchase CPTs and therefore are not requesting that they supplement their Interrogatory No. 9 answers.

Interrogatory No. 10: This interrogatory seeks the identity of each person who participated in your investigation into whether the Thomson Defendants participated in the conspiracy alleged in your complaints. We identified your primary objection to this interrogatory as an assertion of the attorney-client or work-product privileges. We explained that this interrogatory was narrowly targeted to discover specific facts—which individuals were involved in the investigation—and that the names of those individuals are simply a fact, not attorney-client communications or attorney work product. Mr. Jonathan Ross, on behalf of Circuit City, responded by asserting that the identity of outside counsel working on the case was privileged information, but did not provide any legal authority for that position. Mr. Smith added that in his opinion, Interrogatory No. 10 would not lead to the discovery of admissible evidence because, even if we overcome the privilege issue, any information possessed by the identified individuals would be privileged. We then sought to clarify whether it was the DAPs' position that all investigations conducted regarding their potential claims against the Thomson Defendants had been performed by outside counsel. Mr. Smith stated that with respect to his clients, he could not represent that the investigations were performed exclusively by outside counsel, but that his position was that the identity of individuals conducting investigations was privileged, regardless of whether the individual was outside counsel, inside counsel, or a non-attorney employee. The rest of the DAPs stated that they take the same position, and requested that the Thomson Defendants provide them with legal authority in support of our position that the identity of individuals who conducted investigations regarding each of the DAPs' potential claims against the Thomson Defendants is not protected from disclosure by the attorney client privilege and/or work product doctrine.

While we disagree that it should be our responsibility to identify authority regarding your privilege assertion, we believe that there is ample authority to support our position in three key respects. First, it is clear that only attorney-client *communications* are privileged, not the external trappings of an attorney-client relationship, such as facts relating to the creation or existence of the attorney-client relationship.¹ The work-product privilege, on the other hand, protects only documents prepared by, or the mental impressions of, attorneys in anticipation of litigation. While some courts have afforded work product protection to the identity of witnesses interviewed by counsel in preparation for litigation, we do not understand how the identity of the individuals—attorneys or otherwise—who actually conducted the investigation can possibly be classified as work product.

¹ See *Colton v. United States*, 306 F.2d 633, 637–38 (2d Cir.1962) (information about fees received, as well as existence and time frame within which attorney-client relationship existed, not privileged); *Monroe's Estate v. Bottle Rock Power Corp.*, No. 03–2682, 2004 WL 737463, at * 11 (E.D.La. April 2, 2004) (in general, retainer agreements, the identity of clients, the purposes for which attorneys are retained, information relating to billing or fee arrangements, hours spent by attorneys working on the litigation, and payment of attorney's fees do not fall within either the attorney-client or the work-product privilege) (citations omitted); *Parker v. Kitzhaver*, No. 88–1089–JU, 1989 WL 69960, at *1 (D.Or. June 8, 1989) (“The attorney-client privilege is inapplicable to the extent that the interrogatory seeks the names, addresses, telephone numbers, titles, and dates of contact with client representatives.”)

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Second, to the extent that the names of individuals who participated in the investigation, or other information and documents related to the investigation, would otherwise be protected by the attorney-client or work-product privilege, the DAPs have waived any such privilege by putting their investigation into the Thomson Defendants' alleged participation in the conspiracy at issue in this litigation. In response to the motions to dismiss filed by the Thomson Defendants, the DAPs contended that (1) the statute of limitations for their claims has been tolled based on the defendants' fraudulent concealment and (2) that laches does not bar their claims because their multi-year delay in bringing suit against the Thomson Defendants was justified. [Dkt. No. 2377 at 19-23.] The DAPs cannot take these positions and then refuse to produce evidence regarding the nature and timing of their investigations into the Thomson Defendants that would support or undermine their contentions.² Moreover, in its March 13, 2014 Order denying the Thomson Defendants' motions to dismiss, the Court expressly stated that "it is difficult not to find some delay" and that the Thomson Defendants could re-assert their laches arguments after discovery "on a more developed record." [Dkt. No. 2440 at 30].

Finally, to the extent that the information and documents regarding the investigation are protected by the work-product privilege, that privilege is only qualified and may be overcome by a showing of "substantial need" and that the Thomson Defendants cannot "without undue hardship," obtain the "substantial equivalent by other means." See Fed. R. Civ. P. 26(b)(3)(A)(ii). As we noted during the call, the information we have requested regarding the timing and scope of the DAPs' investigation of their claims against the Thomson Defendants is central to proving our laches and statute of limitations defenses and is not available through any other means. It is our understanding that we are at an impasse on this issue, but please let us know if that is not true after reviewing this letter and the case law cited herein.

Interrogatory No. 11: This interrogatory seeks the identity of all documents reviewed during your investigations into whether the Thomson Defendants participated in the alleged conspiracy. We noted that your central objection here was also the attorney-client and work-product privileges. We stated that the mere identity of documents that may have been reviewed cannot possibly be protected by the attorney client privilege. We acknowledged that the work product privilege could potentially apply, but also noted that this privilege may be overcome and that none of the DAPs have provided a privilege log identifying the information withheld in sufficient detail to allow us to evaluate the merits of the privilege claims. Ms. Laura Nelson, on behalf of the Best Buy plaintiffs, responded that the DAPs' privilege claim relates not to particular documents created but to their selection of documents to review, and that producing a log to support this objection would be the functional equivalent of answering the interrogatory. Mr. Blaise Warren, for the Sharp plaintiffs, added that our co-defendant Toshiba has

² See *Rambus Inc. v. Samsung Electronics Co., Ltd.*, C-05-02298 RMW, 2007 WL 3444376 (N.D. Cal. Nov. 13, 2007) (outlining the elements of implied waiver of privilege when a party puts privileged information at issue by alleging a basis to avoid a statute of limitations (citing *Home Indem. Co. v. Lane Powell Moss and Miller*, 43 F.3d 1322, 1326 (9th Cir.1995)); *Seaman v. Sedgwick LLP*, SACV11-664 DOC RNBX, 2014 WL 3738049 (C.D. Cal. June 13, 2014) (same).

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made similar work product privilege objections to requests for the production of translated documents. We indicated that we understood the position that the DAPs are taking regarding the selection of documents, but believe that the issue here is fundamentally different than the selection of documents to translate: the documents reviewed by the DAPs during their investigation are directly relevant to whether the DAPs were diligent in investigating their potential claims against the Thomson Defendants, which is a necessary element of our laches defense. Mr. Ross responded that he believed the relevant inquiry is the subject of Interrogatory No. 12, which requests the date when each DAP first learned of the existence of the alleged conspiracy. All the DAPs agreed that they continue to refuse to identify documents reviewed in their investigation of their claims against the Thomson Defendants.

We also explained that we have not seen any privilege logs in this case and asked whether any of the DAPs had produced privilege logs in connection with their production to other defendants. Mr. Smith responded by explaining that his clients' document production to other defendants was based on extensive negotiations with defendants to produce documents based on agreed search terms; he does not believe any privilege logs were produced. Counsel for Best Buy, Costco, Tech Data, Circuit City, and Sears/Kmart stated that they did have privilege logs that they will be producing.

While we acknowledge that counsel's selection of documents to review can be protected by the work product privilege in some circumstances, we do not believe that any of the DAPs have provided sufficient information to allow us to evaluate the validity of the privilege. Moreover, as discussed above, we believe that the DAPs have waived privilege for this information, to the extent it exists. In any event, we demand at this point that you provide information sufficient to allow us to evaluate your claims of privilege, including, at the minimum, (1) the types of documents reviewed, (2) the source of those documents, and (3) a general description of the process used to identify the documents subject to this request.

Interrogatory No. 12: This interrogatory asks the DAPs to identify when they first learned of the existence of the conspiracy alleged in the complaint. We explained that the DAPs' answers asserted both that they had previously answered this in their responses to other defendants' interrogatories and also that they did not have to answer due to privilege. We asked for clarification. Mr. Ross responded that Circuit City had answered the interrogatory, but would supplement the response to clarify. Sharp, the Boies Schiller Plaintiffs, Tech Data, and Costco responded that they had answered this interrogatory. Ms. Garcia, on behalf for Sears and Kmart, responded that she was unsure of the answers that Sears and Kmart and provided and would follow up with us. Mr. Astor Heaven, for Target, responded that he believed Target had responded to this in other interrogatory responses, but would double check.

Interrogatory Nos. 13 & 14: These interrogatories seek to determine whether the DAPs contend that the Thomson Defendants participated in the alleged conspiracy to fix the prices and/or reduce the output of CDTs during the relevant period, and the basis for any such contention. We noted that the DAPs responded to this interrogatory simply by referring to documents related to a broader conspiracy, without specific reference to the Thomson Defendants alleged participation in any agreements relating to CDTs. We explained that the purpose of this interrogatory was to identify any evidence linking the Thomson Defendants—which did not manufacture, sell or purchase CDTs during the Relevant Period defined in the complaint—with a conspiracy to fix the price of CDTs. We stated that we understand the

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DAPs' position is that there was one overarching conspiracy and that the Thomson Defendants may be held liable for CDT related conduct even if they did not produce or sell CDTs, but noted that we did not think it appropriate for the DAPs to refuse to identify CDT-specific evidence (or the lack thereof) related to the Thomson Defendants based on this legal theory. Ms. Nelson responded that the DAPs do not accept our definition of the conspiracy and that their response answers these interrogatories by identifying the evidence of the conspiracy as they define it under their legal theory. Mr. Ross added that because we phrased our interrogatory as a contention interrogatory, it was appropriate to answer with the basis for their contention, even if we disagree with that basis. We asked whether it was accurate to say that the DAPs' responses have given us what they believe is the evidence of our participation in a conspiracy related to CDTs. Mr. Smith, for the Boies Schiller Plaintiffs, responded that that is accurate, while noting the possibility of supplemental responses based on new evidence. The rest of the DAPs agreed with this position.

Interrogatory Nos. 15 & 16: These interrogatories seek the identity of the documents and evidence that caused the DAPs' to file their complaints against the Thomson Defendants, the dates those documents and evidence were discovered, and an explanation why the DAPs did not name the Thomson Defendants in their initial complaints in this matter. For the reasons identified during our discussion of Interrogatories Nos. 10 & 11, we need this information to pursue our laches defense. Mr. Smith stated that their position is that these interrogatories seek privileged information and they would not respond to these interrogatories absent case law supporting our position. The rest of the DAPs agreed with Mr. Smith's position. We understand we are at an impasse on this issue unless we hear otherwise from you upon receipt of this letter.

RFP Responses

We then moved on to the DAPs' responses to the Thomson Defendants' Requests for Production. We began by discussing the document search and production process that the various DAPs had used with other defendants. We noted that we were not in a position to participate in any negotiations regarding search terms and asked whether the DAPs' responses to our requests were meant to suggest that prior searches were sufficient to respond to our requests. Mr. Smith stated that his clients negotiated a single set of search terms with all defendants, which he will send us, but is willing to meet and confer to discuss expanding on previous searches if we believe they are insufficient. Mr. Warren explained that Sharp did not negotiate search terms, and is not willing to provide the searches it used, but that it performed a "reasonable search" and that its production was not specific to the defendants in this case and would have included Thomson. Mr. Warren called me yesterday morning to further convey that Sharp's search terms included broad keywords such as "CRTs" as well as the term "Thomson" and certain related abbreviations though he did not know at the time exactly what those were. He offered to investigate that issue and get back with me. Mr. Warren also indicated that Sharp gathered all documents available and either looked at them all (the paper documents) or ran the above referenced search terms. Counsel for Tech Data stated that Tech Data's search terms also were not limited to particular defendants and its production would have included documents related to the Thomson Defendants. Mr. Hesterberg stated that Costco's search terms were very broad and would cover all documents responsive to our requests. Ms. Nelson stated that Best Buy's search terms were extremely broad and specifically included "Thomson," but not related abbreviations, and that she read the Thomson Defendants' requests

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to be subsumed within previous productions. Ms. Nelson offered to share with the Thomson Defendants the search terms Best Buy used. Mr. Heaven stated that Target's search terms would have identified documents related to the Thomson Defendants and offered to share Target's search terms. Ms. Garcia stated that she needed to check with someone else in the office, and would follow up with us regarding the Sears and KMart search terms. Mr. Ross stated that Circuit City followed a different procedure because the company no longer existed at the time the suit was filed. He explained that they searched over 3,500 boxes in warehouses for anything having to do with CRTs and that there are no other boxes to search. For the limited electronic mail records that still existed, they performed searches for anything involving CRT Finished Products from any vendor. He represented that they are very confident that they have thoroughly searched for everything that we requested.

We appreciate the information on the DAPs' document production process and ask that each DAP share the search terms they used, to the extent they have not already done so. Once we have reviewed previous searches, we will follow up with individual DAPs if we believe it is necessary to expand the search terms.

Request Nos. 3 & 4: These requests seek information concerning the underlying facts related to knowledge of and the investigation concerning the alleged conspiracy at issue in this lawsuit. We noted that these objections overlap with the earlier discussion involving Interrogatories Nos. 10 & 11, and stated our position that documents withheld due to privilege should be listed on a privilege log with sufficient detail to allow us to evaluate the privilege claims. We stressed that we are looking only for documents regarding the pre-suit investigation, not related to the conduct of their litigation against the Thomson Defendants. We again noted that these documents are necessary to enable us to pursue our laches defense, and that the DAPs have consistently refused to provide us with the information and documents necessary to do so. Ms. Nelson stated that the work-product privilege applies to documents produced in reasonable anticipation of litigation, regardless of when suit was filed. Mr. Ross and Ms. Nelson reiterated their position that they were not going to list external counsel files on a privilege log, and no other DAPs expressed disagreement. We believe we are at an impasse on this issue unless we hear otherwise from DAPs upon receipt of this letter and review of the case law outlined above.

Request No. 6, 7, & 8: These requests and responses were covered by our general discussion regarding search terms, as described above.

Request No. 9: This request seeks all documents that relate to or reference the Thomson Defendants. We noted that the DAPs had objected to this as overbroad, yet had served mirror-image requests on us. Mr. Smith stated that he wanted to review the DAPs' requests, but he believed that any documents responsive to this request would have been captured by their search terms. We will follow up regarding this request, if necessary, after DAPs get back to us upon review of their mirror-image requests and pending our review of the DAPs' search terms.

Request No. 10: This request was also subsumed in the general discussion of search terms, and was tabled pending our review of those search terms.

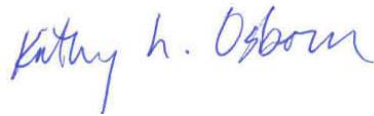
Counsel for DAPs

-8-

August 28, 2014

Again, I invite you to let us know if you disagree with our summary of the call. Further, please advise us by Tuesday, September 2nd at 5:00 EDT regarding your position on the demands we have made in this letter so that we can seek timely Court intervention if necessary.

Sincerely,

A handwritten signature in blue ink that reads "Kathy L. Osborn". The signature is written in a cursive, flowing style.

Kathy L. Osborn

Exhibit 2

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September 9, 2014

VIA ELECTRONIC MAIL

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Mr. Blaise Warren
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Mr. Gene Polyak
gpolyak@bilzin.com

Re: *In re: CRT Antitrust Litigation*, 3:07-cv-5944-SC MDL No. 1917 (N.D. Cal.).

Dear Counsel:

I am writing to request a meeting to discuss deficiencies in the DAPs' responses to Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Requests for Admission, Second Set of Interrogatories and Second Set of Requests for Production of Documents. Since the deadline for filing motions to compel is the Friday, please provide me with times *on or before Thursday, September 11, 2014* when you are available to meet and confer. Additionally, because it is our understanding that the DAPs and the Thomson Defendants have reached an impasse as to several discovery issues discussed in

Counsel for DAPs

-2-

September 9, 2014

prior correspondence and meetings, I have, as a courtesy, included a brief summary of certain answers and productions the Thomson Defendants will be seeking to compel. If any DAPs would be willing to voluntarily provide the discovery sought, and thus avoid motion practice and court intervention, please let me know immediately.

Discovery Regarding the DAPs Opting Out of the Direct Purchaser Plaintiff Class

In this litigation, the Thomson Defendants assert defenses based upon laches and the statute of limitations. DAPs have taken the position that they may benefit from certain class action tolling agreements entered into between the Thomson Defendants and putative or certified classes, even though DAPs opted out of those classes. (*See* March 11, 2013 Letter [Dkt. No. 2431].) Since DAPs claim the benefit of certain tolling agreements, the Thomson Defendants are entitled to understand facts related to the alleged applicability of these tolling agreements to each DAP. This is exactly what Interrogatory No. 1 and RFP No. 2 seek. Despite having put this information at issue in this lawsuit each of the DAPs, to varying degrees, have refused to fully respond to Interrogatory No. 1 and RFP No. 2, by failing to:

- Produce all documents reflecting communications concerning the intent to opt out of a class action, including, without limitation, producing copies of relevant opt-out or exclusion notices and any other communications expressing the intention to opt out of a class;
- Identify the dates on which each DAP contends tolling began and ended;
- Describe the period during which each DAP participated as a member of an actual or putative class; and/or
- Provide descriptions of communications with counsel for the Class, Defendants, or alleged Conspirators regarding the intention to opt out.

This evidence is unquestionably relevant to the Thomson Defendants' defenses and must be produced.

Confirmation that All DAPs Have Admitted All Requests for Admission

The Thomson Defendants need to clarify an ambiguity in the RFA answers served by the parties represented by Boies, Schiller & Flexner LLP (Tech Data, Tweeter, Office Depot, Electrograph, Interbond, PC Richards, Marta, & ABC Appliance). These DAPs admit RFA No. 1, stating "Plaintiff admits this Request." These DAPs then answer RFA Nos. 2-4, as follows: "Plaintiff refers to and incorporates its response to Request for Admission No. 1, including its general and specific objections, as though set forth fully herein." Technically, these answers to RFA Nos. 2-4 might be interpreted as merely admitting RFA No. 1, without actually admitting RFA Nos. 2-4. Notwithstanding this possible interpretation, which would result in RFA Nos. 2-4 having not been answered as required by F.R.C.P. 36(a)(4), the Thomson Defendants understand these DAPs to have admitted to RFA Nos. 2-4. If this understanding is incorrect, please let me know immediately.

Counsel for DAPs

-3-

September 9, 2014

The Thomson Defendants' Anticipated Motion to Compel

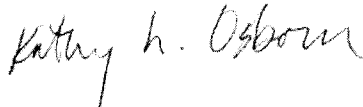
As DAPs are well aware, the Thomson Defendants and DAPs have reached an impasse regarding several other issues discussed during our August 26, 2014 meet and confer. In addition to moving to compel complete responses and production to the discovery just described (if necessary), the Thomson Defendants intend to move to compel complete responses to the following:

- Full answers to Interrogatories Nos. 13 and 14 from the Thomson Defendants' First Set of Interrogatories, which concern evidence that the Thomson Defendants participated in a conspiracy regarding CDTs, as opposed to CPTs, and to which DAPs have improperly objected on the basis of their theory of the case;
- Full answers to Interrogatories Nos. 10-12 and 15-16 from the Thomson Defendants' First Set of Interrogatories, and full production pursuant to RFPs 3-4 from the Thomson Defendants' First Set of Requests for Production, which all concern evidence related to the Thomson Defendants' laches and statute of limitations defenses, and to which DAPs again improperly have objected on the basis of privilege and the work-product doctrine.

Should any DAP wish to voluntarily produce this information and avoid motion practice, please let me know by close of business, ***Wednesday, September 10, 2014.***

I look forward to discussing the issues outlined in this letter with you and hope that we can resolve at least some of the disputes without court intervention.

Sincerely,

A handwritten signature in cursive script that reads "Kathy L. Osborn".

Kathy L. Osborn

Exhibit 3

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***Attorneys for Defendants Thomson
 Consumer, Inc. and Thomson SA***

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

No. 07-cv-5944-SC
 MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v. Technicolor
 SA, et al., No. 13-cv-05724*

**THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS, INC.'S
 FIRST SET OF INTERROGATORIES TO
 ELECTROGRAPH SYSTEMS, INC. AND
 ELECTROGRAPH TECHNOLOGIES
 CORP.**

1 PROPOUNDING PARTY: Thomason SA (n/k/a Technicolor SA) and Thomson Consumer
 2 Electronics, Inc. (n/k/a Technicolor USA, Inc.)
 3 RESPONDING PARTIES: Electrograph Systems, Inc. and Electrograph Technologies Corp.
 4 SET NO.: One
 5

6 In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants
 7 Thomson SA and Thomson Consumer Electronics, Inc. (“Thomson Consumer”) (the “Thomson
 8 Defendants”) hereby request that Electrograph Systems, Inc. and Electrograph Technologies
 9 Corp. (collectively “Electrograph”) respond to the following set of interrogatories (the
 10 “Interrogatories”). Electrograph are directed to serve verified answers in conformance with the
 11 above-cited rules within thirty (30) days after the date of service hereof.

12 I. DEFINITIONS

13 1. “YOU,” “YOUR,” and “YOURSELF” means Electrograph Systems, Inc. and
 14 Electrograph Technologies Corp. as well as their current and former parent companies, current
 15 and former subsidiaries, current and former affiliates, and any employees, agents, attorneys,
 16 representatives, or other persons acting or purporting to act on YOUR behalf.

17 2. “COMPLAINT” refers to the First Amended Complaint filed by YOU on or about
 18 December 20, 2013 in the Northern District of California, Case No. 13-cv-05724.

19 3. “CONSPIRATOR” or “CO-CONSPIRATOR” have the same meaning as in the
 20 COMPLAINT.

21 4. “DEFENDANTS” means the entities enumerated in paragraphs 37 through 46 of
 22 the COMPLAINT.

23 5. “DOCUMENT” or “DOCUMENTS” means and refers to all items identified in
 24 and within the scope of Fed. R. Civ. P. 34(a) and the 1970 Advisory Committee Note thereto,
 25 and all forms of “writings” and “recordings” as defined in Fed. R. Evid. 1001(1), and includes
 26 any reduction to tangible form, including computer or magnetic memory or storage, of
 27 communications, information, or data, including any written, recorded, or filmed graphic matter
 28 of any kind or nature, however produced or reproduced, and including originals, drafts, and non-

1 identical copies, wherever located. This term includes, but is not limited to, letters, books,
2 contracts, agreements, licenses, assignments, correspondence, computer tapes, computer disks,
3 CD-ROMs, DVDs, printouts, memoranda, notes, reports, bulletins, printed forms, telegraphic
4 communications, pleadings and other legal papers, Trademark Office filings and certificates,
5 emails, website print-outs, notes, telexes, telegrams, telecopies, facsimile reproductions or
6 “faxes,” factual compilations, electronic data compilations, statistical compilations, plans,
7 diagrams, journals, change orders, studies, surveys, sketches, art work, product packaging,
8 graphics, checks, ledgers, sales data, electronic wire transfer documentation, catalogs, brochures,
9 pamphlets, press releases, advertisements, invoices, minutes, photographs, microfilm,
10 microfiche, films, personnel files, quotes, purchase orders, telephone records, schedules, bids,
11 voice recordings, transcriptions, and lab notebooks. This definition applies to all DOCUMENTS
12 on the particular subject in your possession, custody, or control, or that of your attorneys, agents,
13 employees, officers, directors, or representatives, irrespective of who generated, prepared, or
14 signed the DOCUMENTS.

15 6. “EVIDENCE” means DOCUMENTS or percipient witness statements or
16 testimony.

17 7. “RELEVANT PERIOD” means the time period alleged in paragraph 1 of the
18 COMPLAINT, i.e., March 1, 1995 to November 25, 2007.

19 8. “PERSON” means any individual or group of individuals, corporation,
20 partnership, association, governmental entity, department, commission, bureau, or other kind of
21 legal or business entity.

22 9. “IDENTIFY” means:

23 (a) When referring to a PERSON, to provide, to the extent known, the person’s full
24 name, and when referring to a natural person, their present or last known place of
25 employment. Once a person has been identified in accordance with this
26 subparagraph, only the name of the person need be listed in response to a
27 subsequent discovery request seeking identification of that person;
28

1 (b) When referring to a DOCUMENT, to provide the bates number stamped on the
2 document; and

3 (c) When referring to EVIDENCE that is not a DOCUMENT, to provide the name of
4 the percipient witness and, if applicable, the page number of the witness's
5 deposition where they gave the relevant testimony.

6 10. The words "and" and "or" shall be construed in the conjunctive or disjunctive,
7 whichever makes the requests more inclusive.

8 11. All nouns in the singular or plural shall be construed in the singular or plural,
9 whichever makes the requests more inclusive.

10 12. The use of the past tense of any verb shall include the present tense and vice
11 versa.

12 13. The word "any" shall be construed to include "all" and vice versa.

13 II. INSTRUCTIONS

14 1. Where an Interrogatory calls for an answer which involves more than one part,
15 each part of the answer should be clearly set out so that it is understandable.

16 2. If YOUR response to a particular Interrogatory is an objection, YOU must set
17 forth in YOUR response the extent of, and the specific ground for, the objection, including the
18 particular privilege or protection being invoked.

19 3. Where an Interrogatory contains a general question, followed by a specific
20 question, the specific question is to be read and interpreted as requesting additional information,
21 not as limiting the general question.

22 4. In responding to the Interrogatories, please repeat each specific Interrogatory or
23 Request and then state YOUR answer or response.

24 5. Each Interrogatory must be answered separately and fully in writing and dated,
25 verified, and signed.

III. INTERROGATORIES

INTERROGATORY NO. 1: IDENTIFY all PERSONS who provided information to answer these Interrogatories.

INTERROGATORY NO. 2: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

INTERROGATORY NO. 3: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

INTERROGATORY NO. 4: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

INTERROGATORY NO. 5: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

INTERROGATORY NO. 6: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

INTERROGATORY NO. 7: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

INTERROGATORY NO. 8: IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegations against the Thomson Defendants contained in paragraphs 153 through 154 of YOUR COMPLAINT.

1 **INTERROGATORY NO. 9:** IDENTIFY each PERSON employed or controlled by
2 YOU who negotiated and/or approved YOUR purchase of CRTs from the Thomson Defendants
3 during the RELEVANT PERIOD.

4 **INTERROGATORY NO. 10:** IDENTIFY each PERSON employed or controlled by
5 YOU who participated in YOUR investigation into whether the Thomson Defendants
6 participated in the conspiracy that is the subject of YOUR COMPLAINT.

7 **INTERROGATORY NO. 11:** IDENTIFY all DOCUMENTS each PERSON
8 IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into
9 whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR
10 COMPLAINT.

11 **INTERROGATORY NO. 12:** IDENTIFY when YOU first learned of the existence of
12 the conspiracy that is the subject of YOUR COMPLAINT.

13 **INTERROGATORY NO. 13:** Do YOU contend that Thomson Consumer participated
14 in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant
15 period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support
16 YOUR contention that Thomson Consumer participated in such a conspiracy regarding CDTs.

17 **INTERROGATORY NO. 14:** Do YOU contend that Thomson SA participated in the
18 alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant
19 period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support
20 YOUR contention that Thomson SA participated in such a conspiracy regarding CDTs.

21 **INTERROGATORY NO. 15:** IDENTIFY the EVIDENCE and DOCUMENTS YOU
22 discovered and the date YOU discovered the EVIDENCE and DOCUMENTS that caused YOU
23 to file YOUR COMPLAINT against the Thomson Defendants.

24 **INTERROGATORY NO. 16:** Explain why YOU did not name Thomson Consumer as
25 a defendant in YOUR original complaint, *Electrograph Systems, Inc.et al. v. Hitachi, Ltd. et al.*,
26 Case No. 2:11-cv-00831, filed by YOU on or about February 18, 2011 in the Eastern District of
27 New York.
28

1
2 Dated: June 5, 2014

/s/ Kathy L. Osborn

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21 ***Attorneys for Defendants Thomson SA and***
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***Attorneys for Defendants Thomson SA and
Thomson Consumer Electronics, Inc.***

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v. Technicolor
SA, et al., No. 13-cv-05724*

**THOMSON SA AND THOMSON
CONSUMER ELECTRONICS, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
ELECTROGRAPH SYSTEMS, INC. AND
ELECTROGRAPH TECHNOLOGIES
CORP.**

1 PROPOUNDING PARTY: Thomason SA (n/k/a Technicolor SA) and Thomson Consumer
2 Electronics, Inc. (n/k/a Technicolor USA, Inc.)

3 RESPONDING PARTIES: Electrograph Systems, Inc. and Electrograph Technologies Corp.

4 SET NO.: One

5
6 In accordance with Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants
7 Thomson SA and Thomson Consumer Electronics, Inc. ("Thomson Consumer") (the "Thomson
8 Defendants") hereby request Electrograph Systems, Inc. and Electrograph Technologies Corp.
9 (collectively "Electrograph") produce for inspection and copying each of the documents and other
10 things described below within thirty (30) days after the date of service hereof.

11 **I. DEFINITIONS**

12 1. "YOU," "YOUR," and "YOURSELF" means Electrograph Systems, Inc. and
13 Electrograph Technologies Corp. as well as their current and former parent companies, current
14 and former subsidiaries, current and former affiliates, and any employees, agents, attorneys,
15 representatives, or other persons acting or purporting to act on YOUR behalf.

16 2. "COMPLAINT" refers to the First Amended Complaint filed by YOU on or about
17 December 20, 2013 in the Northern District of California, Case No. 13-cv-05724.

18 3. "CONSPIRATOR" or "CO-CONSPIRATOR" have the same meaning as in the
19 COMPLAINT.

20 4. "DEFENDANTS" means the entities enumerated in paragraphs 37 through 46 of
21 the COMPLAINT.

22 5. "RELEVANT PERIOD" means the time period alleged in paragraph 1 of the
23 COMPLAINT, i.e., March 1, 1995 to December 2007.

24 6. "DOCUMENT" or "DOCUMENTS" means and refers to all items identified in
25 and within the scope of Fed. R. Civ. P. 34(a) and the 1970 Advisory Committee Note thereto,
26 and all forms of "writings" and "recordings" as defined in Fed. R. Evid. 1001(1), and includes
27 any reduction to tangible form, including computer or magnetic memory or storage, of
28 communications, information, or data, including any written, recorded, or filmed graphic matter

of any kind or nature, however produced or reproduced, and including originals, drafts, and non-identical copies, wherever located. This term includes, but is not limited to, letters, books, contracts, agreements, licenses, assignments, correspondence, computer tapes, computer disks, CD-ROMs, DVDs, printouts, memoranda, notes, reports, bulletins, printed forms, telegraphic communications, pleadings and other legal papers, Trademark Office filings and certificates, emails, website print-outs, notes, telexes, telegrams, telecopies, facsimile reproductions or “faxes,” factual compilations, electronic data compilations, statistical compilations, plans, diagrams, journals, change orders, studies, surveys, sketches, art work, product packaging, graphics, checks, ledgers, sales data, electronic wire transfer documentation, catalogs, brochures, pamphlets, press releases, advertisements, invoices, minutes, photographs, microfilm, microfiche, films, personnel files, quotes, purchase orders, telephone records, schedules, bids, voice recordings, transcriptions, and lab notebooks. This definition applies to all DOCUMENTS on the particular subject in your possession, custody, or control, or that of your attorneys, agents, employees, officers, directors, or representatives, irrespective of who generated, prepared, or signed the DOCUMENTS.

7. The words “and” and “or” shall be construed in the conjunctive or disjunctive, whichever makes the requests more inclusive.

8. All nouns in the singular or plural shall be construed in the singular or plural, whichever makes the requests more inclusive.

9. The use of the past tense of any verb shall include the present tense and vice versa.

10. The word “any” shall be construed to include “all” and vice versa.

II. INSTRUCTIONS

1. YOU are required to produce all DOCUMENTS in the manner, form, and position in which they are kept in the ordinary course of business, as required by the Federal Rules of Civil Procedure, including, where applicable, any index tabs, file dividers, designations, or other information as to the location of the DOCUMENTS.

2. If YOU cannot respond to a request for production fully, after a diligent attempt to obtain the requested information, YOU must answer the request to the extent possible, specify the portion of the request YOU are unable to answer, and provide whatever information YOU have regarding the answered portion.

3. In the event that any requested DOCUMENT has been destroyed, lost, discarded, or is otherwise no longer in YOUR possession, custody, or control, YOU shall IDENTIFY the DOCUMENT as completely as possible and specify the date, manner, and reason the DOCUMENT was disposed, the PERSON who authorized the disposal, and the PERSON who disposed of the DOCUMENT.

4. In the event any information is withheld on a claim of attorney-client privilege, work-product doctrine, or any other applicable privilege, YOU shall provide a privilege log that includes at least the following information: the nature of the information contained in the withheld DOCUMENT, the DOCUMENT date, source, and subject matter, the author(s) and recipient(s), such as would enable the privilege claim to be adjudicated, and any authority that YOU assert supports any claim of privilege.

III. REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS which relate to the Thomson Defendants' sale of CRTs and/or CRT Products to YOU during the RELEVANT PERIOD that you have not previously produced in this litigation to another DEFENDANT.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS which reflect communications during the RELEVANT PERIOD between YOU and the Thomson Defendants regarding CRTs and/or CRT Products that you have not previously produced in this litigation to another DEFENDANT.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS related to when YOU investigated, or attempted to investigate, the existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

REQUEST FOR PRODUCTION NO. 4:

1 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
2 conspiracy that is the subject of YOUR COMPLAINT.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
5 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

6 **REQUEST FOR PRODUCTION NO. 6:**

7 All DOCUMENTS reflecting transaction level data YOU maintained in the ordinary
8 course of business regarding YOUR purchase of CRTs and CRT Products from each Thomson
9 Defendant during the Relevant Period. Please include information regarding the Thomson
10 Defendant from which you purchased the product, the date YOU purchased the product from the
11 Thomson Defendant, the entity that paid for the product, the model number/product code of the
12 product purchased, the quantity of the product purchased, the price YOU paid the Thomson
13 Defendant for the product, any rebates, discounts, credits, and/or price adjustments YOU
14 received in connection with each transaction, the entity to whom the product was initially
15 shipped by the Thomson Defendant, and the location at which the product was initially
16 physically received by YOU.

17 **REQUEST FOR PRODUCTION NO. 7:**

18 All DOCUMENTS reflecting transaction level data YOU maintained in the ordinary
19 course of business regarding YOUR sale of CRTs and CRT Products YOU purchased from each
20 Thomson Defendant during the Relevant Period. Please include information regarding the
21 Thomson Defendant from which you purchased the product, the price YOU paid the Thomson
22 Defendant for the product, the date YOU sold the product YOU purchased from the Thomson
23 Defendant, the model number/product code of the product YOU sold, the quantity of the product
24 YOU sold, the price YOU received when YOU sold the product, and any rebates, discounts,
25 credits, and/or price adjustments YOU provided to the buyer of each product.

REQUEST FOR PRODUCTION NO. 8:

All DOCUMENTS reflecting data YOU maintained in the ordinary course of business regarding profits YOU earned on the sale of CRTs YOU purchased from DEFENDANTS during the Relevant Period.

REQUEST FOR PRODUCTION NO. 9:

All DOCUMENTS which relate to or reference the Thomson Defendants.

REQUEST FOR PRODUCTION NO. 10:

All DOCUMENTS which relate to YOUR allegation that the Thomson Defendants participated in a conspiracy to fix the price of and/or restrain the output of CRTs during the Relevant Period.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the Thomson Defendants' First Set of Interrogatories to YOU.

Dated: June 5, 2014

/s/ Kathy L. Osborn

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***Attorneys for Defendants Thomson SA and
Thomson Consumer Electronics, Inc.***

Exhibit 5

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10 *Counsel for Plaintiff ABC Appliance, Inc.*

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

15 This Document Relates To Individual Case No.
16 3:13-cv-05725-SC (N.D. Cal.)

17 P.C. RICHARD & SON LONG ISLAND
18 CORPORATION, *et al.*,

19 Plaintiffs,

20 v.

21 TECHNICOLOR SA, *et al.*,

22 Defendants.
23

Case No. 3:13-cv-05725-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**ABC APPLIANCE, INC.'S OBJECTIONS
AND RESPONSES TO THOMSON SA
AND THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

ABC Appliance, Inc.

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto; and
- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- 1 • Second Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
4 (dated November 2, 2011);
- 5 • Third Supplemental Responses and Objections of Panasonic Corporation of North
6 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
7 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
8 (dated December 23, 2011);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (dated February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10,
14 2012);
- 15 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
16 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
17 February 10, 2012);
- 18 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
19 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
20 2012);
- 21 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
23 2012);
- 24 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
25 Philips Electronics North America Corporation Responses to Direct Purchaser
26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
27
28

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 3 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 5 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 6 April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 8 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

9 Plaintiff expressly incorporates these discovery responses by reference.

10 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants

11 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-

12 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-

13 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;

14 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;

15 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-

16 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

17 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-

18 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-

19 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

20 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-

21 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;

22 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-

23 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;

24 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;

25 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;

26 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;

27 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;

28 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

1 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 2 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 3 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 4 0091875; CHU00033243; CHU00734336; CHU00032940.

5 Plaintiff also refers Defendants to European Commission announcement of fine of
 6 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 7 of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012),
 8 *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

9 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 10 response to this Interrogatory.

11 **INTERROGATORY NO. 3:**

12 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 13 that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other
 14 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 15 during the RELEVANT PERIOD.

16 **RESPONSE TO INTERROGATORY NO. 3:**

17 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 18 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 19 documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further
 20 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 21 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 22 defendants in this matter, in violation of the integration order included in section XV,
 23 subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,”
 24 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 25 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 26 April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for
 27 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 28 further objects to the extent this request calls for information that is equally available to

Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto.
- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);

- 1 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 3 February 10, 2012);
- 4 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 5 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 6 2012);
- 7 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 8 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 9 2012);
- 10 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 11 Philips Electronics North America Corporation Responses to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 13 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 14 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 15 5 (dated April 12, 2013);
- 16 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 17 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 18 April 26, 2013); and
- 19 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 20 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

21 Plaintiff expressly incorporates these discovery responses by reference.

22 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 23 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 24 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 25 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 26 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 27 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 28 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

1 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 2 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 3 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
 4 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
 5 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
 6 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
 7 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
 8 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
 9 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;
 10 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 11 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 12 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;
 13 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 14 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 15 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 16 0091875; CHU00033243; CHU00734336; CHU00032940.

17 Plaintiff also refers Defendants to European Commission announcement of fine of
 18 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 19 of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012),
 20 *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

21 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 22 response to this Interrogatory.

23 **INTERROGATORY NO. 4:**

24 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 25 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
 26 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

1 completed its discovery and preparation in this matter, and its investigation of these cases is
 2 ongoing. This Response is being made after reasonable inquiry into the relevant facts, and is
 3 based only upon the information and documentation that is presently known to Plaintiff. Further
 4 investigation and discovery may result in the identification of additional information or
 5 contentions, and Plaintiff reserves the right to modify or supplement its response. Plaintiff's
 6 responses should not be construed to prejudice its right to conduct further investigation in this
 7 case, or to limit their use of any additional evidence that may be developed.

8 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial
 9 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
 10 of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation,
 11 including its production of organizational charts and similar documents pursuant to Defendants'
 12 Requests for Production.

13 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 14 response to this Interrogatory.

15 **INTERROGATORY NO. 10:**

16 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
 17 investigation into whether the Thomson Defendants participated in the conspiracy that is the
 18 subject of YOUR COMPLAINT.

19 **RESPONSE TO INTERROGATORY NO. 10:**

20 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 21 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
 22 whole or in part, made by other defendants in this matter, in violation of the integration order
 23 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 24 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 25 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 26 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
 27 extent that this request calls for information that is covered by attorney-client privilege or the
 28 work product protection.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for

1 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 2 further objects to the extent this request calls for information that is equally available to
 3 Defendants.

- 4 • Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of
 5 America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips
 6 Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14,
 7 including all supplemental responses thereto.

8 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 9 response to this Interrogatory.

10 **INTERROGATORY NO. 13:**

11 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
 12 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 13 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 14 Consumer participated in such a conspiracy regarding CDTs.

15 **RESPONSE TO INTERROGATORY NO. 13:**

16 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 17 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 18 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 19 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 20 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 21 defendants in this matter, in violation of the integration order included in section XV,
 22 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 23 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 24 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 25 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
 26 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
 27 this request calls for information that is covered by attorney-client privilege or the work product
 28 protection. Plaintiff further objects to the extent this request calls for information that is equally

1 available to Defendants.

2 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
3 Interrogatories Nos. 2 and 3.

4 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
5 response to this Interrogatory.

6 **INTERROGATORY NO. 14:**

7 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
8 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
9 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
10 participated in such a conspiracy regarding CDTs.

11 **RESPONSE TO INTERROGATORY NO. 14:**

12 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
13 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
14 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
15 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
16 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
17 defendants in this matter, in violation of the integration order included in section XV,
18 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
19 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
20 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
21 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
22 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
23 this request calls for information that is covered by attorney-client privilege or the work product
24 protection. Plaintiff further objects to the extent this request calls for information that is equally
25 available to Defendants.

26 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
27 Interrogatories Nos. 2 and 3.

1 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
2 response to this Interrogatory.

3 **INTERROGATORY NO. 15:**

4 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
5 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
6 against the Thomson Defendants.

7 **RESPONSE TO INTERROGATORY NO. 15:**

8 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
9 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
10 whole or in part, made by other defendants in this matter, in violation of the integration order
11 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
12 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
13 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
14 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this
15 Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff
16 further objects to the extent that this request calls for information that is covered by attorney-
17 client privilege or the work product protection.

18 **INTERROGATORY NO. 16:**

19 Explain why YOU did not name Thomson Consumer as a defendant in your original
20 complaint, *P.C. Richard & Son Long Island Corporation et al. v. Hitachi, Ltd. et al.*, Case No.
21 1:11-cv-05530, filed by YOU on or about November 14, 2011 in the Eastern District of New
22 York.

23 **RESPONSE TO INTERROGATORY NO. 16:**

24 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
25 Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to
26 lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this
27 request calls for information that is covered by attorney-client privilege or the work product
28 protection.

1 DATED: July 10, 2014

/s/ Philip J. Iovieno

2 Philip J. Iovieno
3 Anne M. Nardacci
4 BOIES, SCHILLER & FLEXNER LLP
5 30 South Pearl Street, 11th Floor
6 Albany, NY 12207
7 Telephone: (518) 434-0600
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Exhibit 6

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Counsel for Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05724-SC (N.D. Cal.)

Case No. 3:13-cv-05724-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

ELECTROGRAPH SYSTEMS, INC. *et al.*,

Plaintiffs,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**ELECTROGRAPH SYSTEMS, INC. AND
ELECTROGRAPH TECHNOLOGIES
CORP.'S OBJECTIONS AND
RESPONSES TO THOMSON SA AND
THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTIES:

Electrograph Systems, Inc. and Electrograph
Technologies Corp.

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Plaintiffs further object to the extent this request calls for expert testimony. Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiffs further object to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiffs state that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiffs' Responses to Hitachi America, Ltd.'s and Samsung SDI Co., Ltd.'s First Set of Interrogatories, Nos. 1, 2, and 12, including all supplemental responses thereto; and
- Plaintiffs' Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiffs also refer Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita

Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);

- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 12, 2013);

- 1 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 2 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 3 April 26, 2013); and
- 4 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 5 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

6 Plaintiffs expressly incorporate these discovery responses by reference.

7 Subject to and without waiving the foregoing objections, Plaintiffs also refer Defendants

8 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-

9 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-

10 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;

11 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;

12 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-

13 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

14 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-

15 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-

16 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

17 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-

18 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;

19 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-

20 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;

21 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;

22 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;

23 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;

24 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;

25 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

26 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-

27 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-

28 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-

0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiffs also refer Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes €1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiffs’ discovery requests on June 25, 2014. Plaintiffs further object to the extent this request calls for expert testimony. Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,” entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiffs further object to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiffs state that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiffs' Responses to Hitachi America, Ltd.'s and Samsung SDI Co., Ltd.'s First Set of Interrogatories, Nos. 1, 2, and 12, including all supplemental responses thereto; and
- Plaintiffs' Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiffs also refer Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);

- 1 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 3 2012);
- 4 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 5 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 6 2012);
- 7 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 8 Philips Electronics North America Corporation Responses to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 10 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 11 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 12 5 (dated April 12, 2013);
- 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 14 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 15 April 26, 2013); and
- 16 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 17 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

18 Plaintiffs expressly incorporate these discovery responses by reference.

19 Subject to and without waiving the foregoing objections, Plaintiffs also refer Defendants
 20 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 21 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 22 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 23 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 24 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 25 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 26 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 27 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 28 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JIJ-

00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiffs also refer Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their response to this Interrogatory.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiffs’ discovery requests on June 25, 2014. Plaintiffs further object to the extent this request calls for expert testimony. Plaintiffs further object to the extent

1 right to conduct further investigation in this case, or to limit their use of any additional evidence
2 that may be developed.

3 Subject to and notwithstanding the foregoing objections, Plaintiffs refer to their Initial
4 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
5 of Civil Procedure 33(d), Plaintiffs further refer to their document productions in this litigation,
6 including their production of organizational charts and similar documents pursuant to
7 Defendants' Requests for Production.

8 Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their
9 response to this Interrogatory.

10 **INTERROGATORY NO. 10:**

11 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
12 investigation into whether the Thomson Defendants participated in the conspiracy that is the
13 subject of YOUR COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 10:**

15 Plaintiffs refer to and incorporate their General Objections as if set forth fully herein.
16 Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in
17 whole or in part, made by other defendants in this matter, in violation of the integration order
18 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
19 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
20 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
21 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the
22 extent that this request calls for information that is covered by attorney-client privilege or the
23 work product protection.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Plaintiffs further object to the extent this request calls for expert testimony. Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the extent that this request calls for

1 information that is covered by attorney-client privilege or the work product protection. Plaintiffs
 2 further object to the extent this request calls for information that is equally available to
 3 Defendants.

- 4 • Plaintiffs' Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set
 5 of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

6 Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their
 7 response to this Interrogatory.

8 **INTERROGATORY NO. 13:**

9 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
 10 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 11 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 12 Consumer participated in such a conspiracy regarding CDTs.

13 **RESPONSE TO INTERROGATORY NO. 13:**

14 Plaintiffs refer to and incorporate their General Objections as if set forth fully herein.
 15 Plaintiffs further object that this Interrogatory is premature given that Defendants first produced
 16 documents in response to Plaintiffs' discovery requests on June 25, 2014. Plaintiffs further
 17 object to the extent this request calls for expert testimony. Plaintiffs further object to this
 18 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 19 defendants in this matter, in violation of the integration order included in section XV,
 20 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 21 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 22 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 23 April 3, 2012), Docket No. 1128. Plaintiffs further object to this Interrogatory to the extent that
 24 it calls for a legal conclusion or legal argumentation. Plaintiffs further object to the extent that
 25 this request calls for information that is covered by attorney-client privilege or the work product
 26 protection. Plaintiffs further object to the extent this request calls for information that is equally
 27 available to Defendants.

1 Subject to and notwithstanding the foregoing objections, Plaintiffs refer to their response
2 to Interrogatories Nos. 2 and 3.

3 Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their
4 response to this Interrogatory.

5 **INTERROGATORY NO. 14:**

6 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
7 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
8 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
9 participated in such a conspiracy regarding CDTs.

10 **RESPONSE TO INTERROGATORY NO. 14:**

11 Plaintiffs refer to and incorporate their General Objections as if set forth fully herein.
12 Plaintiffs further object that this Interrogatory is premature given that Defendants first produced
13 documents in response to Plaintiffs' discovery requests on June 25, 2014. Plaintiffs further
14 object to the extent this request calls for expert testimony. Plaintiffs further object to this
15 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
16 defendants in this matter, in violation of the integration order included in section XV,
17 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
18 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
19 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
20 April 3, 2012), Docket No. 1128. Plaintiffs further object to this Interrogatory to the extent that
21 it calls for a legal conclusion or legal argumentation. Plaintiffs further object to the extent that
22 this request calls for information that is covered by attorney-client privilege or the work product
23 protection. Plaintiffs further object to the extent this request calls for information that is equally
24 available to Defendants.

25 Subject to and notwithstanding the foregoing objections, Plaintiffs refer to their response
26 to Interrogatories Nos. 2 and 3.

27 Discovery is ongoing and Plaintiffs reserve the right to supplement and/or amend their
28 response to this Interrogatory.

INTERROGATORY NO. 15:

IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT against the Thomson Defendants.

RESPONSE TO INTERROGATORY NO. 15:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 16:

Explain why YOU did not name Thomson Consumer as a defendant in your original complaint, *Electrograph Systems, Inc. et al. v. Hitachi, Ltd. et al.*, Case No. 2:11-cv-00831, filed by YOU on or about February 18, 2011 in the Eastern District of New York.

RESPONSE TO INTERROGATORY NO. 16:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object to this Interrogatory as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

DATED: July 10, 2014

/s/ Philip J. Iovieno

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*Counsel for Plaintiffs Electrograph Systems, Inc. and
Electrograph Technologies Corp.*

Exhibit 7

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Counsel for Plaintiff Interbond Corporation of America

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05727-SC (N.D. Cal.)

Case No. 3:13-cv-05727-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

INTERBOND CORPORATION OF
AMERICA,

Plaintiff,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**INTERBOND CORPORATION OF
AMERICA'S OBJECTIONS AND
RESPONSES TO THOMSON SA AND
THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

Interbond Corporation of America

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff refers Defendants to documents produced in this litigation with the following Bates numbers:

CHU 00028291–CHU 00028292; CHU 00036414–CHU 00036415; CHU 00021262–CHU 00021263; CHU 00029116–CHU 00029123; CHU 00029131–CHU 00029137; CHU 00029144–CHU 00029146; CHU 00029152–CHU 00029154; CHU 00029179–CHU 00029184; CHU 00029281–CHU 00029286; CHU 00005963–CHU 00005963; CHU 00005997–CHU 00006001; CHU 00006009–CHU 00006010; CHU 00006362–CHU 00006363; CHU 00014200–CHU 00014201; CHU 00014202–CHU 00014206; CHU 00014215–CHU 00014217; CHU 00014218; CHU 00014219–CHU 00014222; CHU 00014223–CHU 00014226; CHU 00014227–CHU 00014229; CHU 00014230–CHU 00014231; CHU 00014232; CHU 00017115–CHU 00017115; CHU 00020660–CHU 00020660; CHU 00020661–CHU 00020662; CHU 00020779–CHU 00020781; CHU 00021268–CHU 00021271; CHU 00021268–CHU 00021271; CHU 00021272–CHU 00021278; CHU 00021289; CHU 00022696–CHU 00022696; CHU 00024554–CHU 00024559; CHU 00024560–CHU 00024568; CHU 00028203; CHU 00028209–CHU

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 5 CRT-020281-PHLP-CRT-020282; PHLP-CRT-021673-PHLP-CRT-021676; PHLP-CRT-
 6 023137-PHLP-CRT-023138; PHLP-CRT-023189-PHLP-CRT-023191; PHLP-CRT-023513-
 7 PHLP-CRT-023521; PHLP-CRT-023911-PHLP-CRT-023915; PHLP-CRT-024274-PHLP-
 8 CRT-024275; PHLP-CRT-026590; PHLP-CRT-027715-PHLP-CRT-027716; PHLP-CRT-
 9 027718-PHLP-CRT-027721; PHLP-CRT-033925-PHLP-CRT-033926; PHLP-CRT-034434 ;
 10 PHLP-CRT-035014-PHLP-CRT-035022; PHLP-CRT-037999-PHLP-CRT-038001; PHLP-
 11 CRT-038073-PHLP-CRT-038074; PHLP-CRT-038897-PHLP-CRT-038898; PHLP-CRT-
 12 039666-PHLP-CRT-039667; PHLP-CRT-080623-PHLP-CRT 080626; PHLP-CRT-081748-
 13 PHLP-CRT-081750; PHLP-CRT-084315-PHLP-CRT-084332; PHLP-CRT089512-PHLP-
 14 CRT-089518; PHLP-CRT-089918; PHLP-CRT-090221; PHLP-CRT-091458 (& Attachment);
 15 PHLP-CRT-091703; PHLP-CRT-094860; PHLP-CRT-098241-PHLP-CRT-098243; PTC-
 16 00004295; PTC-00006474-PTC-00006483; PTC-00007204; PTC-00007205; PTC-0000737;
 17 PTC-00009040-PTC-00009045; SDCRT-0086830; SDCRT-0086847; SDCRT-0086910;
 18 SDCRT-0086927; SDCRT-0086762; SDCRT-0086868; SDCRT-0086884-SDCRT-0086834;
 19 SDCRT-0086852; SDCRT-0086917; SDCRT-0086931; SDCRT-0086765; SDCRT-0086870;
 20 SDCRT-0086887; SDCRT-0086593-SDCRT-0086596; SDCRT-0087953-SDCRT-0087962;
 21 SDCRT-0002423; SDCRT-0002448; SDCRT-0002515; SDCRT-0002585-SDCRT-0002587;
 22 SDCRT-0002588-SDCRT-0002589; SDCRT-0052170; SDCRT-0005813; SDCRT-0005818;
 23 SDCRT-0005830-SDCRT-0005842; SDCRT-0005933-SDCRT-0005936; SDCRT-0005944-
 24 SDCRT-0005945; SDCRT-0005949; SDCRT-0006041-SDCRT-0006042; SDCRT-0006043-
 25 SDCRT-0006044; SDCRT-0006266-SDCRT-0006267; SDCRT-0006442-SDCRT-0006452;
 26 SDCRT-0006510-SDCRT-0006512; SDCRT-0006632-SDCRT-0006633; SDCRT-0006868-
 27 SDCRT-0006869; SDCRT-0006903-SDCRT-0006904; SDCRT-0006927; SDCRT-0006928;
 28 SDCRT-0007145-SDCRT-0007146; SDCRT-0007173; SDCRT-0007237; SDCRT-0007239;

1 SDCRT-0007277–SDCRT-0007278; SDCRT-0007280–SDCRT-0007281; SDCRT-0007282–
 2 SDCRT-0007296; SDCRT-0007538; SDCRT-0007539; SDCRT-0007539–SDCRT-0007553;
 3 SDCRT-0007585–SDCRT-0007587; SDCRT-0007588–SDCRT-0007594; SDCRT-0007602–
 4 SDCRT-0007602; SDCRT-0007609–SDCRT-0007610; SDCRT-0007615; SDCRT-0008729–
 5 SDCRT-0008730; SDCRT-0008946–SDCRT-0008947; SDCRT-0022048; SDCRT-0031662–
 6 SDCRT-0031663; SDCRT-0048512–SDCRT-0048516; SDCRT-0063870–SDCRT-0063871;
 7 SDCRT-0066181–SDCRT-0066191; SDCRT-0006670–SDCRT-0006673; SDCRT-0066803–
 8 SDCRT-0066804; SDCRT-0067998–SDCRT-0067998; SDCRT-0067999–SDCRT-0067999;
 9 SDCRT-0068849–SDCRT-0068851; SDCRT-0069574–SDCRT-0069575; SDCRT-0072527–
 10 SDCRT-0072528; SDCRT-0073107–SDCRT-0073108; SDCRT-0076953; SDCRT-0076954;
 11 SDCRT-0079381–SDCRT-0079382; SDCRT-0084985; SDCRT-0085141–SDCRT-0085145;
 12 SDCRT-0085394–SDCRT-0085395; SDCRT-0085535–SDCRT-0085540; SDCRT-0085646–
 13 SDCRT-0085647; SDCRT-0086208–SDCRT-0086210; SDCRT-0086211–SDCRT-0086212;
 14 SDCRT-0086221–SDCRT-0086223; SDCRT-0086224–SDCRT-0086226; SDCRT-0086238–
 15 SDCRT-0086240; SDCRT-0086245–SDCRT-0086246; SDCRT-0086247–SDCRT-0086247;
 16 SDCRT-0086248–SDCRT-0086248; SDCRT-0086249–SDCRT-0086252; SDCRT-0086253–
 17 SDCRT-0086255; SDCRT-0086256–SDCRT-0086260; SDCRT-0086270–SDCRT-0086270;
 18 SDCRT-0086373; SDCRT-0086331; SDCRT-0086269; SDCRT-0086318; SDCRT-0086351–
 19 SDCRT-0086378; SDCRT-0086335; SDCRT-0086274; SDCRT-0086320; SDCRT-0086355;
 20 SDCRT-0086416–SDCRT-0086418; SDCRT-0086416–SDCRT-0086418; SDCRT-0086419–
 21 SDCRT-0086420; SDCRT-0086419–SDCRT-0086420; SDCRT-0086440–SDCRT-0086441;
 22 SDCRT-0086445–SDCRT-0086448; SDCRT-0086460–SDCRT-0086465; SDCRT-0086473–
 23 SDCRT-0086474; SDCRT-0086480–SDCRT-0086480; SDCRT-0086481–SDCRT-0086481;
 24 SDCRT-0086482–SDCRT-0086484; SDCRT-0086485–SDCRT-0086486; SDCRT-0086487–
 25 SDCRT-0086488; SDCRT-0086512–SDCRT-0086513; SDCRT-0086532–SDCRT-0086536;
 26 SDCRT-0086537–SDCRT-0086539; SDCRT-0086541–SDCRT-0086544; SDCRT-0086545–
 27 SDCRT-0086545; SDCRT-0086551–SDCRT-0086553; SDCRT-0086557–SDCRT-0086560;
 28 SDCRT-0086561–SDCRT-0086562; SDCRT-0086563–SDCRT-0086566; SDCRT-0086569–

1 SDCRT-0086570; SDCRT-0086577–SDCRT-0086578; SDCRT-0086584–SDCRT-0086585;
 2 SDCRT-0086586–SDCRT-0086587; SDCRT-0086593–SDCRT-0086596; SDCRT-0086597–
 3 SDCRT-0086597; SDCRT-0086605–SDCRT-0086606; SDCRT-0086632–SDCRT-0086633;
 4 SDCRT-0086641–SDCRT-0086645; SDCRT-0086649–SDCRT-0086651; SDCRT-0086662–
 5 SDCRT-0086664; SDCRT-0086672–SDCRT-0086674; SDCRT-0086675–SDCRT-0086681;
 6 SDCRT-0086690–SDCRT-0086690; SDCRT-0086700–SDCRT-0086702; SDCRT-0086703–
 7 SDCRT-0086705; SDCRT-0086722–SDCRT-0086732; SDCRT-0086733 ; SDCRT-0086751–
 8 SDCRT-0086753; SDCRT-0086788–SDCRT-0087560; SDCRT-0086903–SDCRT-0087546;
 9 SDCRT-0087107–SDCRT-0087109; SDCRT-0087177–SDCRT-0087178; SDCRT-0087206–
 10 SDCRT-0087208; SDCRT-0087314–SDCRT-0087315; SDCRT-0087316–SDCRT-0087319;
 11 SDCRT-0087331–SDCRT-0087333; SDCRT-0087371–SDCRT-0087372; SDCRT-0087381–
 12 SDCRT-0087383; SDCRT-0087393–SDCRT-0087398; SDCRT-0087405–SDCRT-0087407;
 13 SDCRT-0087408–SDCRT-0087410; SDCRT-0087411–SDCRT-0087413; SDCRT-0087414–
 14 SDCRT-0087416; SDCRT-0087417– SDCRT-0087422; SDCRT-0087427–SDCRT-0087429;
 15 SDCRT-0087464–SDCRT-0087466; SDCRT-0087467–SDCRT-0087469; SDCRT-0087667–
 16 SDCRT-0087669; SDCRT-0087679; SDCRT-0087743–SDCRT-0087744; SDCRT-0087934–
 17 SDCRT-0087937; SDCRT-0087934–SDCRT-0087937; SDCRT-0087944–SDCRT-0087950;
 18 SDCRT-0087953–SDCRT-0087962; SDCRT-0087963–SDCRT-0087969; SDCRT-0088661–
 19 SDCRT-0088674; SDCRT-0088705–SDCRT-0088712; SDCRT-0088715–SDCRT-0088719;
 20 SDCRT-0088720–SDCRT-0088725; SDCRT-0088726–SDCRT-0088730; SDCRT-0088732–
 21 SDCRT-0088733; SDCRT-0088763–SDCRT-0088772; SDCRT-0088791–SDCRT-0088794;
 22 SDCRT-0088798–SDCRT-0088802; SDCRT-0088832–SDCRT-0088836; SDCRT-0088846–
 23 SDCRT-0088851; SDCRT-0089031–SDCRT-0089035; SDCRT-0089057–SDCRT-0089060;
 24 SDCRT-0089073–SDCRT-0089076; SDCRT-0089087–SDCRT-0089095; SDCRT-0090157–
 25 SDCRT-0090159; SDCRT-0090163–SDCRT-0090164; SDCRT-0090167–SDCRT-0090168;
 26 SDCRT-0090174–SDCRT-0090176; SDCRT-0090180–SDCRT-0090185; SDCRT-0090233–
 27 SDCRT-0090233; SDCRT-0090253–SDCRT-0090254; SDCRT-0090258–SDCRT-0090266;
 28 SDCRT-0090275–SDCRT-0090277; SDCRT-0090280–SDCRT-0090282; SDCRT-0090299–

1 SDCRT-0090301; SDCRT-0090312–SDCRT-0090313; SDCRT-0090319–SDCRT-0090321;
 2 SDCRT-0090322–SDCRT-0090324; SDCRT-0090328–SDCRT-0090338; SDCRT-0090350–
 3 SDCRT-0090353; SDCRT-0090350–SDCRT-0090353; SDCRT-0090846–SDCRT-0090848;
 4 SDCRT-0091351–SDCRT-0091352; SDCRT-0091364–SDCRT-0091366; SDCRT-0091377–
 5 SDCRT-0091381; SDCRT-0091400–SDCRT-0091401; SDCRT-0091524–SDCRT-0091530;
 6 SDCRT-0091599–SDCRT-0091604; SDCRT-0091605–SDCRT0091615; SDCRT-0091616–
 7 SDCRT-0091619; SDCRT-0091628–SDCRT-0091633; SDCRT-0091634–SDCRT-0091639;
 8 SDCRT-0091643–SDCRT-0091647; SDCRT-0091656–SDCRT-0091659; SDCRT-0091668–
 9 SDCRT-0091672; SDCRT-0091687–SDCRT-0091691; SDCRT-0091692–SDCRT-0091701;
 10 SDCRT-0091715–SDCRT-0091718; SDCRT-0091715–SDCRT-0091718; SDCRT-0091737–
 11 SDCRT-0091742; SDCRT-0091836–SDCRT-0091836; SDCRT-0091843–SDCRT-0091843;
 12 SDCRT-0091844–SDCRT-0091852; SDCRT-0091903–SDCRT-0091904; SDCRT-0093913–
 13 SDCRT-0093914; SDCRT-0093949–SDCRT-0093949; SDCRT-0096624–SDCRT-0096624;
 14 SDCRT-0009687–SDCRT-0009691; SDCRT-0104771–SDCRT-0104772; SDCRT-0139342–
 15 SDCRT-0139342; SDCRT-0160057–SDCRT-0160059; SDCRT-0161561–SDCRT-0161565;
 16 SDCRT-0170843; SDCRT-0175930–SDCRT-0175930; SDCRT-0176803–SDCRT-0176807;
 17 SDCRT-0178236–SDCRT-0178236; SDCRT-0190375–SDCRT-0190376; SDCRT-0199834–
 18 SDCRT-0199836; SDCRT-0215655; SDCRT-0086449–SDCRT-0086454; SDCRT-0088732–
 19 SDCRT-0088733; SDCRT-0086427–SDCRT-0086428; TAEC-CRT-00089342–TAEC-CRT-
 20 00089344; TAEC-CRT-00087223–TAEC-CRT-00087224; TAEC-CRT-00088054–TAEC-CRT-
 21 00088055; TAEC-CRT-00088432–TAEC-CRT-00088434; TAEC-CRT-00088715–TAEC-CRT-
 22 00088716; TAEC-CRT-00089968–TAEC-CRT-00089969; TAEC-CRT-00090127–TAEC-CRT-
 23 00090128; TAEC-CRT-00093312–TAEC-CRT-00093313; TAEC-CRT-00096166–TAEC-CRT-
 24 00096168; TAEC-CRT-00096935–TAEC-CRT-00096937; TAEC-CRT-00056158–TAEC-CRT-
 25 00056167; TAEC-CRT-00091750–TAEC-CRT-00091751; TAEC-CRT-00095236–TAEC-CRT-
 26 00095237; TSB-CRT-00035348–TSB-CRT-00035349; TSB-CRT-00035350–TSB-CRT-
 27 00035352; TSB-CRT-00039194–TSB-CRT-00039196; TSB-CRT-00039414–TSB-CRT-
 28 00039414; TSB-CRT-00039415–TSB-CRT-00039415; TSB-CRT-00041527–TSB-CRT-

00041528; TSB-CRT-00041620–TSB-CRT-00041623; TSB-CRT-00041633–TSB-CRT-00041634; TSB-CRT-00041721–TSB-CRT-00041724; TSB-CRT-00041746–TSB-CRT-00041749; TSB-CRT-00041862–TSB-CRT-00041863; TSB-CRT-00041870–TSB-CRT-00041871; TSB-CRT-00042493–TSB-CRT-00042495.

Plaintiffs further refer to Plaintiff's Responses to LG Electronics, Inc.'s and Panasonic Corporation of North America's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);

- 1 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 3 2012);
- 4 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 5 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 6 2012);
- 7 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 8 Philips Electronics North America Corporation Responses to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 10 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 11 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 12 5 (dated April 12, 2013);
- 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 14 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 15 April 26, 2013); and
- 16 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 17 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

18 Plaintiff expressly incorporates these discovery responses by reference.

19 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 20 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 21 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 22 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 23 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 24 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 25 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 26 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 27 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 28 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further

objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff refers to the evidence set forth in its Response to Interrogatory No. 2. Plaintiff further states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to LG Electronics, Inc.'s and Panasonic Corporation of North America's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);

- 1 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 2 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First
- 3 Set of Interrogatories (dated February 10, 2012);
- 4 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 5 Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
- 6 February 10, 2012);
- 7 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 8 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 9 February 10, 2012);
- 10 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 11 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 12 2012);
- 13 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 14 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 15 2012);
- 16 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 17 Philips Electronics North America Corporation Responses to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 19 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 20 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 21 5 (dated April 12, 2013);
- 22 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 23 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 24 April 26, 2013); and
- 25 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 26 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

27 Plaintiff expressly incorporates these discovery responses by reference.

28 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants

1 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 2 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 3 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 4 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 5 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 6 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 7 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 8 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 9 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
 10 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
 11 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
 12 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
 13 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
 14 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
 15 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;
 16 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 17 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 18 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;
 19 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 20 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 21 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 22 0091875; CHU00033243; CHU00734336; CHU00032940.

23 Plaintiff also refers Defendants to European Commission announcement of fine of
 24 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 25 of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012),
 26 *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

27 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 28 response to this Interrogatory.

1 contentions, and Plaintiff reserves the right to modify or supplement its response. Plaintiff's
2 responses should not be construed to prejudice its right to conduct further investigation in this
3 case, or to limit their use of any additional evidence that may be developed.

4 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial
5 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
6 of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation,
7 including its production of organizational charts and similar documents pursuant to Defendants'
8 Requests for Production.

9 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
10 response to this Interrogatory.

11 **INTERROGATORY NO. 10:**

12 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
13 investigation into whether the Thomson Defendants participated in the conspiracy that is the
14 subject of YOUR COMPLAINT.

15 **RESPONSE TO INTERROGATORY NO. 10:**

16 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
17 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
18 whole or in part, made by other defendants in this matter, in violation of the integration order
19 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
20 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
21 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
22 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
23 extent that this request calls for information that is covered by attorney-client privilege or the
24 work product protection.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for

1 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 2 further objects to the extent this request calls for information that is equally available to
 3 Defendants.

- 4 • Plaintiff's Responses to LG Electronics, Inc.'s and Panasonic Corporation of North
 5 America's First Set of Interrogatories, Nos. 12 and 14, including all supplemental
 6 responses thereto.

7 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 8 response to this Interrogatory.

9 **INTERROGATORY NO. 13:**

10 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
 11 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 12 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 13 Consumer participated in such a conspiracy regarding CDTs.

14 **RESPONSE TO INTERROGATORY NO. 13:**

15 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 16 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 17 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 18 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 19 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 20 defendants in this matter, in violation of the integration order included in section XV,
 21 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 22 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 23 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 24 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
 25 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
 26 this request calls for information that is covered by attorney-client privilege or the work product
 27 protection. Plaintiff further objects to the extent this request calls for information that is equally
 28 available to Defendants.

1 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
2 Interrogatories Nos. 2 and 3.

3 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
4 response to this Interrogatory.

5 **INTERROGATORY NO. 14:**

6 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
7 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
8 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
9 participated in such a conspiracy regarding CDTs.

10 **RESPONSE TO INTERROGATORY NO. 14:**

11 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
12 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
13 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
14 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
15 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
16 defendants in this matter, in violation of the integration order included in section XV,
17 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
18 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
19 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
20 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
21 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
22 this request calls for information that is covered by attorney-client privilege or the work product
23 protection. Plaintiff further objects to the extent this request calls for information that is equally
24 available to Defendants.

25 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
26 Interrogatories Nos. 2 and 3.

27 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
28 response to this Interrogatory.

INTERROGATORY NO. 15:

IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT against the Thomson Defendants.

RESPONSE TO INTERROGATORY NO. 15:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 16:

Explain why YOU did not name Thomson Consumer as a defendant in your original complaint, *Interbond Corporation of America v. Hitachi, Ltd. et al.*, Case No. 0:11-cv-62437, filed by YOU on or about November 14, 2011 in the Southern District of Florida.

RESPONSE TO INTERROGATORY NO. 16:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

DATED: July 10, 2014

/s/ Philip J. Iovieno

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2 BOIES, SCHILLER & FLEXNER LLP
3 30 South Pearl Street, 11th Floor
4 Albany, NY 12207
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5 William A. Isaacson
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8
9 *Counsel for Plaintiff Interbond Corporation of America*
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Exhibit 8

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anardacci@bsflp.com

Counsel for Plaintiff MARTA Cooperative of America, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05725-SC (N.D. Cal.)

Case No. 3:13-cv-05725-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

P.C. RICHARD & SON LONG ISLAND
CORPORATION, *et al.*,

Plaintiffs,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**MARTA COOPERATIVE OF AMERICA,
INC.'S OBJECTIONS AND RESPONSES
TO THOMSON SA AND THOMSON
CONSUMER ELECTRONICS, INC.'S
FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

MARTA Cooperative of America, Inc.

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto; and
- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- 1 • Second Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
4 (dated November 2, 2011);
- 5 • Third Supplemental Responses and Objections of Panasonic Corporation of North
6 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
7 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
8 (dated December 23, 2011);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (dated February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10,
14 2012);
- 15 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
16 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
17 February 10, 2012);
- 18 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
19 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
20 2012);
- 21 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
23 2012);
- 24 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
25 Philips Electronics North America Corporation Responses to Direct Purchaser
26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
27
28

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 3 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 5 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 6 April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 8 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

9 Plaintiff expressly incorporates these discovery responses by reference.

10 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 11 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 12 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 13 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 14 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 15 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 16 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 17 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 18 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 19 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
 20 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
 21 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
 22 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
 23 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
 24 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
 25 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;
 26 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 27 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 28 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

1 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 2 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 3 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 4 0091875; CHU00033243; CHU00734336; CHU00032940.

5 Plaintiff also refers Defendants to European Commission announcement of fine of
 6 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 7 of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012),
 8 *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

9 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 10 response to this Interrogatory.

11 **INTERROGATORY NO. 3:**

12 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 13 that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other
 14 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 15 during the RELEVANT PERIOD.

16 **RESPONSE TO INTERROGATORY NO. 3:**

17 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 18 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 19 documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further
 20 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 21 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 22 defendants in this matter, in violation of the integration order included in section XV,
 23 subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,”
 24 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 25 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 26 April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for
 27 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 28 further objects to the extent this request calls for information that is equally available to

1 Defendants.

2 Subject to and notwithstanding the foregoing objections, Plaintiff states that information
3 responsive to this Interrogatory can be found in the following discovery:

- 4 • Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of
5 Interrogatories and Philips Electronics North America Corporation's Third Set of
6 Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto.
- 7 • Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of
8 America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips
9 Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14,
10 including all supplemental responses thereto.

11 Plaintiff also refers Defendants to any response referencing Thomson or its personnel in
12 the following:

- 13 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
14 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 15 • Second Supplemental Responses and Objections of Panasonic Corporation of North
16 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
17 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
18 (dated November 2, 2011);
- 19 • Third Supplemental Responses and Objections of Panasonic Corporation of North
20 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
21 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
22 (dated December 23, 2011);
- 23 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
24 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First
25 Set of Interrogatories (dated February 10, 2012);
- 26 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
27 Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
28 February 10, 2012);

- 1 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 3 February 10, 2012);
- 4 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 5 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 6 2012);
- 7 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 8 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 9 2012);
- 10 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 11 Philips Electronics North America Corporation Responses to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 13 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 14 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 15 5 (dated April 12, 2013);
- 16 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 17 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 18 April 26, 2013); and
- 19 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 20 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

21 Plaintiff expressly incorporates these discovery responses by reference.

22 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 23 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 24 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 25 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 26 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 27 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 28 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

1 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 2 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 3 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
 4 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
 5 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
 6 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
 7 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
 8 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
 9 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;
 10 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 11 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 12 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;
 13 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 14 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 15 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 16 0091875; CHU00033243; CHU00734336; CHU00032940.

17 Plaintiff also refers Defendants to European Commission announcement of fine of
 18 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 19 of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012),
 20 *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

21 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 22 response to this Interrogatory.

23 **INTERROGATORY NO. 4:**

24 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 25 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
 26 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

1 completed its discovery and preparation in this matter, and its investigation of these cases is
 2 ongoing. This Response is being made after reasonable inquiry into the relevant facts, and is
 3 based only upon the information and documentation that is presently known to Plaintiff. Further
 4 investigation and discovery may result in the identification of additional information or
 5 contentions, and Plaintiff reserves the right to modify or supplement its response. Plaintiff's
 6 responses should not be construed to prejudice its right to conduct further investigation in this
 7 case, or to limit their use of any additional evidence that may be developed.

8 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial
 9 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
 10 of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation,
 11 including its production of organizational charts and similar documents pursuant to Defendants'
 12 Requests for Production.

13 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 14 response to this Interrogatory.

15 **INTERROGATORY NO. 10:**

16 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
 17 investigation into whether the Thomson Defendants participated in the conspiracy that is the
 18 subject of YOUR COMPLAINT.

19 **RESPONSE TO INTERROGATORY NO. 10:**

20 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 21 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
 22 whole or in part, made by other defendants in this matter, in violation of the integration order
 23 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 24 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 25 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 26 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
 27 extent that this request calls for information that is covered by attorney-client privilege or the
 28 work product protection.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for

1 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 2 further objects to the extent this request calls for information that is equally available to
 3 Defendants.

- 4 • Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of
 5 America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips
 6 Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14,
 7 including all supplemental responses thereto.

8 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 9 response to this Interrogatory.

10 **INTERROGATORY NO. 13:**

11 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
 12 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 13 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 14 Consumer participated in such a conspiracy regarding CDTs.

15 **RESPONSE TO INTERROGATORY NO. 13:**

16 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 17 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 18 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 19 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 20 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 21 defendants in this matter, in violation of the integration order included in section XV,
 22 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 23 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 24 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 25 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
 26 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
 27 this request calls for information that is covered by attorney-client privilege or the work product
 28 protection. Plaintiff further objects to the extent this request calls for information that is equally

1 available to Defendants.

2 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
3 Interrogatories Nos. 2 and 3.

4 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
5 response to this Interrogatory.

6 **INTERROGATORY NO. 14:**

7 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
8 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
9 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
10 participated in such a conspiracy regarding CDTs.

11 **RESPONSE TO INTERROGATORY NO. 14:**

12 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
13 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
14 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
15 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
16 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
17 defendants in this matter, in violation of the integration order included in section XV,
18 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
19 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
20 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
21 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
22 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
23 this request calls for information that is covered by attorney-client privilege or the work product
24 protection. Plaintiff further objects to the extent this request calls for information that is equally
25 available to Defendants.

26 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
27 Interrogatories Nos. 2 and 3.

1 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
2 response to this Interrogatory.

3 **INTERROGATORY NO. 15:**

4 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
5 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
6 against the Thomson Defendants.

7 **RESPONSE TO INTERROGATORY NO. 15:**

8 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
9 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
10 whole or in part, made by other defendants in this matter, in violation of the integration order
11 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
12 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
13 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
14 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this
15 Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff
16 further objects to the extent that this request calls for information that is covered by attorney-
17 client privilege or the work product protection.

18 **INTERROGATORY NO. 16:**

19 Explain why YOU did not name Thomson Consumer as a defendant in your original
20 complaint, *P.C. Richard & Son Long Island Corporation et al. v. Hitachi, Ltd. et al.*, Case No.
21 1:11-cv-05530, filed by YOU on or about November 14, 2011 in the Eastern District of New
22 York.

23 **RESPONSE TO INTERROGATORY NO. 16:**

24 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
25 Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to
26 lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this
27 request calls for information that is covered by attorney-client privilege or the work product
28 protection.

1 DATED: July 10, 2014

/s/ Philip J. Iovieno

2 Philip J. Iovieno
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18 *Counsel for Plaintiff MARTA Cooperative of America, Inc.*

Exhibit 9

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Counsel for Plaintiff Office Depot, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05726-SC (N.D. Cal.)

Case No. 3:13-cv-05726-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

OFFICE DEPOT, INC.

Plaintiff,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**OFFICE DEPOT, INC.'S OBJECTIONS
AND RESPONSES TO THOMSON SA
AND THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

Office Depot, Inc.

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Koninklijke Philips N.V.'s and Toshiba America Electronic Components, Inc.'s First Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto; and
- Plaintiff's Responses to Toshiba America Electronic Components, Inc.'s and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita

1 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
2 (dated November 2, 2011);

- 3 • Third Supplemental Responses and Objections of Panasonic Corporation of North
4 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
5 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
6 (dated December 23, 2011);
 - 7 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
8 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
9 Interrogatories (dated February 10, 2012);
 - 10 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
11 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10,
12 2012);
 - 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
15 February 10, 2012);
 - 16 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
17 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
18 2012);
 - 19 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
20 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
21 2012);
 - 22 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
23 Philips Electronics North America Corporation Responses to Direct Purchaser
24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
 - 25 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
26 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
27 5 (dated April 12, 2013);
- 28

- 1 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 2 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 3 April 26, 2013); and
- 4 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 5 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

6 Plaintiff expressly incorporates these discovery responses by reference.

7 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants

8 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-

9 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-

10 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;

11 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;

12 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-

13 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

14 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-

15 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-

16 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

17 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-

18 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;

19 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-

20 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;

21 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;

22 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;

23 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;

24 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;

25 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

26 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-

27 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-

28 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-

0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,” entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- 1 • Plaintiff's Responses to Koninklijke Philips N.V.'s and Toshiba America Electronic
- 2 Components, Inc.'s First Set of Interrogatories, Nos. 1, 2, and 9, including all
- 3 supplemental responses thereto; and
- 4 • Plaintiff's Responses to Toshiba America Electronic Components, Inc.'s and Philips
- 5 Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14,
- 6 including all supplemental responses thereto.

7 Plaintiff also refers Defendants to any response referencing Thomson or its personnel in
8 the following:

- 9 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 10 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 11 • Second Supplemental Responses and Objections of Panasonic Corporation of North
- 12 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
- 13 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 14 (dated November 2, 2011);
- 15 • Third Supplemental Responses and Objections of Panasonic Corporation of North
- 16 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
- 17 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 18 (dated December 23, 2011);
- 19 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 20 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First
- 21 Set of Interrogatories (dated February 10, 2012);
- 22 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 23 Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
- 24 February 10, 2012);
- 25 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 26 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 27 February 10, 2012);
- 28

- 1 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 3 2012);
- 4 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 5 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 6 2012);
- 7 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 8 Philips Electronics North America Corporation Responses to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 10 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 11 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 12 5 (dated April 12, 2013);
- 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 14 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 15 April 26, 2013); and
- 16 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 17 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

18 Plaintiff expressly incorporates these discovery responses by reference.

19 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 20 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 21 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 22 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 23 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 24 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 25 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 26 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 27 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 28 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to the extent

1 responses should not be construed to prejudice its right to conduct further investigation in this
2 case, or to limit their use of any additional evidence that may be developed.

3 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial
4 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
5 of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation,
6 including its production of organizational charts and similar documents pursuant to Defendants'
7 Requests for Production.

8 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
9 response to this Interrogatory.

10 **INTERROGATORY NO. 10:**

11 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
12 investigation into whether the Thomson Defendants participated in the conspiracy that is the
13 subject of YOUR COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 10:**

15 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
16 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
17 whole or in part, made by other defendants in this matter, in violation of the integration order
18 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
19 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
20 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
21 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
22 extent that this request calls for information that is covered by attorney-client privilege or the
23 work product protection.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for

1 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 2 further objects to the extent this request calls for information that is equally available to
 3 Defendants.

- 4 • Plaintiff's Responses to Toshiba America Electronic Components, Inc.'s and Philips
 5 Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14,
 6 including all supplemental responses thereto.

7 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 8 response to this Interrogatory.

9 **INTERROGATORY NO. 13:**

10 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
 11 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 12 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 13 Consumer participated in such a conspiracy regarding CDTs.

14 **RESPONSE TO INTERROGATORY NO. 13:**

15 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 16 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 17 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 18 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 19 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 20 defendants in this matter, in violation of the integration order included in section XV,
 21 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 22 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 23 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 24 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
 25 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
 26 this request calls for information that is covered by attorney-client privilege or the work product
 27 protection. Plaintiff further objects to the extent this request calls for information that is equally
 28 available to Defendants.

1 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
2 Interrogatories Nos. 2 and 3.

3 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
4 response to this Interrogatory.

5 **INTERROGATORY NO. 14:**

6 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
7 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
8 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
9 participated in such a conspiracy regarding CDTs.

10 **RESPONSE TO INTERROGATORY NO. 14:**

11 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
12 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
13 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
14 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
15 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
16 defendants in this matter, in violation of the integration order included in section XV,
17 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
18 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
19 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
20 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
21 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
22 this request calls for information that is covered by attorney-client privilege or the work product
23 protection. Plaintiff further objects to the extent this request calls for information that is equally
24 available to Defendants.

25 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
26 Interrogatories Nos. 2 and 3.

27 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
28 response to this Interrogatory.

INTERROGATORY NO. 15:

IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT against the Thomson Defendants.

RESPONSE TO INTERROGATORY NO. 15:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 16:

Explain why YOU did not name Thomson Consumer as a defendant in your original complaint, *Office Depot, Inc. v. Hitachi, Ltd. et al.*, Case No. 9:11-cv-81263, filed by YOU on or about November 14, 2011 in the Southern District of Florida.

RESPONSE TO INTERROGATORY NO. 16:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

DATED: July 10, 2014

/s/ Philip J. Iovieno

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2 BOIES, SCHILLER & FLEXNER LLP
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8
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10 *Counsel for Plaintiff Office Depot, Inc.*
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Exhibit 10

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Counsel for Plaintiff P.C. Richard & Son Long Island Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05725-SC (N.D. Cal.)

Case No. 3:13-cv-05725-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

P.C. RICHARD & SON LONG ISLAND
CORPORATION, *et al.*,

Plaintiffs,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**P.C. RICHARD & SON LONG ISLAND
CORPORATION'S OBJECTIONS AND
RESPONSES TO THOMSON SA AND
THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

P.C. Richard & Son Long Island Corporation

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto; and
- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 12, 2013);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 26, 2013); and
- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

Plaintiff expressly incorporates these discovery responses by reference.

Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
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- Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 12, 2013);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 26, 2013); and
- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

Plaintiff expressly incorporates these discovery responses by reference.

Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,” entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to

Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff's Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto.
- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);

CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;
 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;
 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of
 producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers
 of TV and computer monitor tubes €1.47 billion for two decade-long cartels” (Dec. 5, 2012),
available at http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 response to this Interrogatory.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

completed its discovery and preparation in this matter, and its investigation of these cases is ongoing. This Response is being made after reasonable inquiry into the relevant facts, and is based only upon the information and documentation that is presently known to Plaintiff. Further investigation and discovery may result in the identification of additional information or contentions, and Plaintiff reserves the right to modify or supplement its response. Plaintiff's responses should not be construed to prejudice its right to conduct further investigation in this case, or to limit their use of any additional evidence that may be developed.

Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation, including its production of organizational charts and similar documents pursuant to Defendants' Requests for Production.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 10:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 11:

1 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory
 2 No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated
 3 in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

4 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 5 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
 6 whole or in part, made by other defendants in this matter, in violation of the integration order
 7 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 8 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 9 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 10 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
 11 extent that this request calls for information that is covered by attorney-client privilege or the
 12 work product protection.

INTERROGATORY NO. 12:

14 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
 15 of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

17 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 18 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 19 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 20 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 21 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 22 defendants in this matter, in violation of the integration order included in section XV,
 23 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 24 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 25 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 26 April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for

information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

- Plaintiff's Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 13:

Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson Consumer participated in such a conspiracy regarding CDTs.

RESPONSE TO INTERROGATORY NO. 13:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally

available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to Interrogatories Nos. 2 and 3.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 14:

Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA participated in such a conspiracy regarding CDTs.

RESPONSE TO INTERROGATORY NO. 14:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to Interrogatories Nos. 2 and 3.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 15:

IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT against the Thomson Defendants.

RESPONSE TO INTERROGATORY NO. 15:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 16:

Explain why YOU did not name Thomson Consumer as a defendant in your original complaint, *P.C. Richard & Son Long Island Corporation et al. v. Hitachi, Ltd. et al.*, Case No. 1:11-cv-05530, filed by YOU on or about November 14, 2011 in the Eastern District of New York.

RESPONSE TO INTERROGATORY NO. 16:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

1 DATED: July 10, 2014

/s/ Philip J. Iovieno

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3 Anne M. Nardacci
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Exhibit 11

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Counsel for Plaintiff Schultze Agency Services, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To Individual Case No.
3:13-cv-05668-SC (N.D. Cal.)

Case No. 3:13-cv-05668-SC

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

SCHULTZE AGENCY SERVICES, LLC ON
BEHALF OF TWEETER OPCO, LLC AND
TWEETER NEWCO, LLC,

Plaintiff,

v.

TECHNICOLOR SA, *et al.*,

Defendants.

**SCHULTZE AGENCY SERVICES, LLC'S
("TWEETER") OBJECTIONS AND
RESPONSES TO THOMSON SA AND
THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

PROPOUNDING PARTIES:

Defendants Thomson SA and Thomson
Consumer Electronics, Inc.

RESPONDING PARTY:

Schultze Agency Services, LLC (“Tweeter”)

SET:

One

RESPONSE TO INTERROGATORY NO. 2:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiffs' Responses to Hitachi America, Ltd.'s and Samsung SDI Co., Ltd.'s First Set of Interrogatories, Nos. 1, 2, and 12, including all supplemental responses thereto; and
- Plaintiff's Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Plaintiff also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita

1 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
 2 (dated November 2, 2011);

- 3 • Third Supplemental Responses and Objections of Panasonic Corporation of North
 4 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
 5 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
 6 (dated December 23, 2011);
- 7 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
 8 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
 9 Interrogatories (dated February 10, 2012);
- 10 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
 11 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10,
 12 2012);
- 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
 14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
 15 February 10, 2012);
- 16 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
 17 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
 18 2012);
- 19 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
 20 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
 21 2012);
- 22 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
 23 Philips Electronics North America Corporation Responses to Direct Purchaser
 24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 25 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
 26 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
 27 5 (dated April 12, 2013);

- 1 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 2 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 3 April 26, 2013); and
- 4 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 5 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

6 Plaintiff expressly incorporates these discovery responses by reference.

7 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants

8 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-

9 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-

10 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;

11 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;

12 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-

13 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-

14 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-

15 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-

16 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-

17 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-

18 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;

19 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-

20 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;

21 MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;

22 SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;

23 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;

24 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;

25 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;

26 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-

27 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-

28 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-

0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court’s “Order Re Discovery and Case Management Protocol,” entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff states that information responsive to this Interrogatory can be found in the following discovery:

- 1 • Plaintiffs' Responses to Hitachi America, Ltd.'s and Samsung SDI Co., Ltd.'s First
- 2 Set of Interrogatories, Nos. 1, 2, and 12, including all supplemental responses thereto;
- 3 and
- 4 • Plaintiff's Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set
- 5 of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

6 Plaintiff also refers Defendants to any response referencing Thomson or its personnel in
7 the following:

- 8 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 9 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 10 • Second Supplemental Responses and Objections of Panasonic Corporation of North
- 11 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
- 12 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 13 (dated November 2, 2011);
- 14 • Third Supplemental Responses and Objections of Panasonic Corporation of North
- 15 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
- 16 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 17 (dated December 23, 2011);
- 18 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 19 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First
- 20 Set of Interrogatories (dated February 10, 2012);
- 21 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 22 Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
- 23 February 10, 2012);
- 24 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 25 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 26 February 10, 2012);

- 1 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 3 2012);
- 4 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
- 5 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21,
- 6 2012);
- 7 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
- 8 Philips Electronics North America Corporation Responses to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 10 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 11 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 12 5 (dated April 12, 2013);
- 13 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 14 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 15 April 26, 2013); and
- 16 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 17 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

18 Plaintiff expressly incorporates these discovery responses by reference.

19 Subject to and without waiving the foregoing objections, Plaintiff also refers Defendants
 20 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
 21 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
 22 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
 23 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 24 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 25 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
 26 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
 27 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
 28 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JIJ-

00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Plaintiff also refers Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff’s discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to the extent

1 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its Initial
 2 Disclosures made in this multidistrict litigation, dated March 27, 2014. Pursuant to Federal Rule
 3 of Civil Procedure 33(d), Plaintiff further refers to its document productions in this litigation,
 4 including its production of organizational charts and similar documents pursuant to Defendants'
 5 Requests for Production.

6 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 7 response to this Interrogatory.

8 **INTERROGATORY NO. 10:**

9 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
 10 investigation into whether the Thomson Defendants participated in the conspiracy that is the
 11 subject of YOUR COMPLAINT.

12 **RESPONSE TO INTERROGATORY NO. 10:**

13 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 14 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in
 15 whole or in part, made by other defendants in this matter, in violation of the integration order
 16 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 17 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 18 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 19 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
 20 extent that this request calls for information that is covered by attorney-client privilege or the
 21 work product protection.

22 **INTERROGATORY NO. 11:**

23 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory
 24 No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated
 25 in the conspiracy that is the subject of YOUR COMPLAINT.

26 **RESPONSE TO INTERROGATORY NO. 11:**

27 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 28 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in

1 whole or in part, made by other defendants in this matter, in violation of the integration order
 2 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 3 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 4 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 5 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to the
 6 extent that this request calls for information that is covered by attorney-client privilege or the
 7 work product protection.

8 **INTERROGATORY NO. 12:**

9 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
 10 of YOUR COMPLAINT.

11 **RESPONSE TO INTERROGATORY NO. 12:**

12 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
 13 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
 14 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
 15 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
 16 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
 17 defendants in this matter, in violation of the integration order included in section XV,
 18 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
 19 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
 20 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
 21 April 3, 2012), Docket No. 1128. Plaintiff further objects to the extent that this request calls for
 22 information that is covered by attorney-client privilege or the work product protection. Plaintiff
 23 further objects to the extent this request calls for information that is equally available to
 24 Defendants.

- 25 • Plaintiff's Responses to Panasonic Corporation's and LG Electronics, Inc.'s First Set
 26 of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

27 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
 28 response to this Interrogatory.

INTERROGATORY NO. 13:

Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson Consumer participated in such a conspiracy regarding CDTs.

RESPONSE TO INTERROGATORY NO. 13:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects that this Interrogatory is premature given that Defendants first produced documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further objects to the extent this request calls for expert testimony. Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiff further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to Interrogatories Nos. 2 and 3.

Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 14:

Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,

1 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
2 participated in such a conspiracy regarding CDTs.

3 **RESPONSE TO INTERROGATORY NO. 14:**

4 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
5 Plaintiff further objects that this Interrogatory is premature given that Defendants first produced
6 documents in response to Plaintiff's discovery requests on June 25, 2014. Plaintiff further
7 objects to the extent this request calls for expert testimony. Plaintiff further objects to this
8 Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other
9 defendants in this matter, in violation of the integration order included in section XV,
10 subsections D and E of the Court's "Order Re Discovery and Case Management Protocol,"
11 entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re
12 Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal.
13 April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory to the extent that
14 it calls for a legal conclusion or legal argumentation. Plaintiff further objects to the extent that
15 this request calls for information that is covered by attorney-client privilege or the work product
16 protection. Plaintiff further objects to the extent this request calls for information that is equally
17 available to Defendants.

18 Subject to and notwithstanding the foregoing objections, Plaintiff refers to its response to
19 Interrogatories Nos. 2 and 3.

20 Discovery is ongoing and Plaintiff reserves the right to supplement and/or amend its
21 response to this Interrogatory.

22 **INTERROGATORY NO. 15:**

23 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
24 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
25 against the Thomson Defendants.

26 **RESPONSE TO INTERROGATORY NO. 15:**

27 Plaintiff refers to and incorporates its General Objections as if set forth fully herein.
28 Plaintiff further objects to this Interrogatory because it is duplicative of other interrogatories, in

whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiff further objects to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

INTERROGATORY NO. 16:

Explain why YOU did not name Thomson Consumer as a defendant in your original complaint, *Schultze Agency Services et al. v. Hitachi, Ltd. et al.*, Case No. 1:11-cv-05529, filed by YOU on or about November 14, 2011 in the Eastern District of New York.

RESPONSE TO INTERROGATORY NO. 16:

Plaintiff refers to and incorporates its General Objections as if set forth fully herein. Plaintiff further objects to this Interrogatory as seeking information not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

DATED: July 10, 2014

/s/ Philip J. Iovieno

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Counsel for Plaintiff Schultze Agency Services, LLC

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Exhibit 12

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
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Attorneys for Plaintiffs

BEST BUY CO., INC.; BEST BUY
 PURCHASING LLC; BEST BUY ENTERPRISE
 SERVICES, INC.; BEST BUY STORES, L.P.;
 BESTBUY.COM, LLC; MAGNOLIA HI-FI, INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. M:07-5994-SC
 MDL No. 1917

This Document Relates to
 Individual Case No. 3:11-cv-05264-SC

Case No. 3:13-cv-05264-SC

BEST BUY CO., INC.; BEST BUY
 PURCHASING LLC; BEST BUY
 ENTERPRISE SERVICES, INC.; BEST BUY
 STORES, L.P.; BESTBUY.COM, L.L.C.; and
 MAGNOLIA HI-FI, LLC,

Plaintiffs,

v.

TECHNICOLOR SA (f/k/a THOMSON SA),
 TECHNICOLOR USA, INC. (f/k/a
 THOMSON CONSUMER ELECTRONICS,
 INC.), VIDEOCON INDUSTRIES, LTD.,
 TECHNOLOGIES DISPLAYS AMERICAS
 LLC (f/k/a THOMSON DISPLAYS
 AMERICAS LLC), MITSUBISHI ELECTRIC
 CORPORATION; MITSUBISHI ELECTRIC
 VISUAL SOLUTIONS AMERICA, INC.; and
 MITSUBISHI ELECTRIC & ELECTRONICS
 USA, INC.,

Defendants.

**BEST BUY'S OBJECTIONS AND
 RESPONSES TO DEFENDANTS
 THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS,
 INC.'S FIRST SET OF
 INTERROGATORIES**

PROPOUNDING PARTIES: THOMSON SA AND THOMSON CONSUMER ELECTRONICS, INC.

RESPONDING PARTY: BEST BUY CO., INC.; BEST BUY PURCHASING LLC; BEST BUY ENTERPRISE SERVICES, INC.; BEST BUY STORES, L.P.; BESTBUY.COM, L.L.C.; and MAGNOLIA HI-FI, INC.

SET NO.: FIRST

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc., Best Buy Stores, L.P.; BestBuy.Com, L.L.C.; and Magnolia HI-FI, Inc. (collectively "Best Buy") hereby Object and Respond to Defendants Thomson SA and Thomson Consumer Electronics, Inc.'s First Set of Interrogatories (hereinafter, the "Interrogatories").

RESERVATIONS OF RIGHTS

In responding to these Interrogatories, Best Buy states that it has conducted, or will conduct, a diligent search, reasonable in scope, for information that is relevant to the Interrogatories. In the event that additional information relevant to the Interrogatories is later identified or brought to Best Buy's attention, Best Buy reserves the right to amend, revise, supplement, modify, or clarify the following objections and responses. Best Buy further reserves the right to complete its investigation and discovery of the facts, and to rely at trial or in other proceedings upon additional information, regardless of whether such information is newly discovered or newly in existence.

Best Buy incorporates by reference any evidence identified by the Direct Purchaser Plaintiffs, Indirect Purchaser Plaintiffs, and the other Direct Action Plaintiffs in response to any discovery request.

Best Buy has responded to these Interrogatories as it interprets and understands them. If Defendants subsequently assert an interpretation of any Interrogatory or response that differs from Best Buy's understanding, Best Buy reserves the right to supplement or amend its objections or responses.

engaging in anticompetitive conduct.

Additionally, Best Buy refers Thomson to the European Commission's announcement of fine of producers of cathode ray tubes. European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012), available at http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Finally, Best Buy refers Thomson to the testimony of Panasonic's Shinichi Iwamoto.

Best Buy reserves the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

Interrogatory No. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

Response:

Best Buy incorporates and restates its response to Interrogatory No. 2.

Interrogatory No. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

Response:

Best Buy incorporates and restates its response to Interrogatory No. 2. Best Buy further states that information responsive to this Interrogatory is contained in the following:

- Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s First Set of Interrogatories (October 8, 2013);

- Statement of Albino Bessa Re Technologies Displays Americas, LLC (April 18, 2014);
- Answer of Thomson Consumer Electronics, Inc. to Plaintiffs' Complaint (April 25, 2014);
- Answer of Thomson SA to Plaintiffs' Complaint (April 25, 2014); and
- Answer of Technologies Displays Americas, LLC to Plaintiffs' Complaint (June 23, 2014).

Interrogatory No. 5:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

Response:

Best Buy incorporates and restates its response to Interrogatory No. 4.

Interrogatory No. 6:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

Response:

Best Buy incorporates and restates its response to Interrogatory No. 4.

Interrogatory No. 7:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

Response:

Best Buy incorporates and restates its response to Interrogatory No. 4.

Interrogatory No. 8:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegations against the Thomson Defendants contained in paragraphs 146 through 148 of

1 YOUR COMPLAINT.

2 **Response:**

3 Best Buy incorporates and restates its response to Interrogatory No. 4.

4 **Interrogatory No. 9:**

5 IDENTIFY each PERSON employed or controlled by YOU who negotiated and/or
6 approved YOUR purchase of CRTs from the Thomson Defendants during the
7 RELEVANT PERIOD.

8 **Response:**

9 In addition to the General Objections above, Best Buy objects to this interrogatory
10 because it is overly broad, unduly burdensome, and oppressive, particularly as it
11 requests that Best Buy identify each person, and seeks information that is maintained by
12 and equally available to Defendants. Best Buy further objects to the extent this request is
13 duplicative of other discovery propounded by Defendants in MDL No. 1917. Subject to
14 and without waiving its objections, Best Buy states that information responsive to this
15 Interrogatory is contained in the following discovery responses, which are incorporated
16 herein by reference:

- 17 • Best Buy's Answers to Defendants Panasonic Corporations and LG Electronics,
18 Inc.'s First Set of Interrogatories.

19 **Interrogatory No. 10:**

20 IDENTIFY each PERSON employed or controlled by YOU who participated in
21 YOUR investigation into whether the Thomson Defendants participated in the
22 conspiracy that is the subject of YOUR COMPLAINT.

23 **Response:**

24 In addition to the General Objections above, Best Buy objects to this interrogatory
25 as seeking information covered by the attorney client privilege and work product
26 protections.

27 **Interrogatory No. 11:**

28 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to

1 Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson
2 Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

3 **Response:**

4 In addition to the General Objections above, Best Buy objects to this interrogatory
5 as seeking information covered by the attorney client privilege and work product
6 protections.

7 **Interrogatory No. 12:**

8 IDENTIFY when YOU first learned of the existence of the conspiracy that is the
9 subject of YOUR COMPLAINT.

10 **Response:**

11 In addition to the General Objections above, Best Buy objects to this interrogatory
12 as seeking information covered by the attorney client privilege and work product
13 protections.

14 **Interrogatory No. 13:**

15 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to
16 fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do
17 so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention
18 that Thomson Consumer participated in such a conspiracy regarding CDTs.

19 **Response:**

20 Best Buy incorporates and restates its response to Interrogatory No. 4.

21 **Interrogatory No. 14:**

22 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the
23 price of and/or reduce the output of CDTs during the relevant period? If YOU do so
24 contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention
25 that Thomson SA participated in such a conspiracy regarding CDTs.

26 **Response:**

27 Best Buy incorporates and restates its response to Interrogatory No. 4.

28 **Interrogatory No. 15:**

1 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
2 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR
3 COMPLAINT against the Thomson Defendants.

4 **Response:**

5 In addition to the General Objections above, Best Buy objects to this interrogatory
6 as seeking information covered by the attorney client privilege and work product
7 protections.

8 **Interrogatory No. 16:**

9 Explain why YOU did not name Thomson Consumer as a defendant in YOUR
10 original complaint, *Best Buy Co., Inc., et al. v. Hitachi, Ltd. et al.*, Case No. 11-cv-05513,
11 filed by YOU on or about November 14, 2011 in the Northern District of California.

12 **Response:**

13 In addition to the General Objections above, Best Buy objects to this interrogatory
14 as seeking information covered by the attorney client privilege and work product
15 protections.

16
17 DATED: July 21, 2014

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

18 By: /s/ Laura E. Nelson
19 Roman M. Silberfeld
20 David Martinez
21 Laura E. Nelson

22 **ATTORNEYS FOR PLAINTIFFS**
23 **BEST BUY CO., INC.; BEST BUY PURCHASING**
24 **LLC; BEST BUY ENTERPRISE SERVICES, INC.;**
25 **BEST BUY STORES, L.P.; BESTBUY.COM, LLC;**
26 **MAGNOLIA HI-FI, INC.**

Exhibit 13

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Attorneys for Plaintiff
Costco Wholesale Corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

No. 07-cv-05944-SC

MDL No. 1917

This Document Relates To:

*Costco Wholesale Corp. v. Hitachi, Ltd.,
 et al.*, No 3:11-cv-06397-SC

**COSTCO WHOLESALE CORPORATION'S
 OBJECTIONS AND RESPONSES TO
 THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS, INC.'S
 FIRST SET OF INTERROGATORIES**

PROPOUNDING PARTY: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

RESPONDING PARTY: Costco Wholesale Corporation

SET NO.: One

1 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
2 during the RELEVANT PERIOD.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Costco refers to and incorporates its General Objections as if set forth fully herein.
5 Costco further objects to this Interrogatory on the grounds that it is a premature contention
6 interrogatory, as well as overly broad and unduly burdensome. Costco also objects that this
7 Interrogatory is premature given that Thomson first produced documents on June 25, 2014.
8 Costco further objects to the extent this request calls for expert testimony. Costco also objects to
9 the extent that this request calls for information that is covered by attorney-client privilege or the
10 work product protection. Costco further objects to the extent this request calls for information
11 that is equally available to Thomson. Finally, Costco objects to this Interrogatory as duplicative
12 of other discovery taken in this case.

13 Subject to and without waiving the foregoing objections, Costco states that information
14 responsive to this Interrogatory can be found in:

- 15 • Costco's Responses to Tatung Company of America, Inc. and Samsung Electronics
- 16 Co., Ltd.'s First Set of Interrogatories, Nos. 12-14 (dated August 17, 2012); and
- 17 • Costco's First Supplemental Responses to Hitachi America Ltd. and Samsung SDI
- 18 Co., Ltd.'s First Set of Interrogatories, Nos. 2 and 10 (dated June 3, 2014).

19 Costco expressly incorporates those discovery responses by reference.

20 Costco also refers the Defendants to any response referencing Thomson or its personnel in
21 the following discovery:

- 22 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 23 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 24 • Second Supplemental Responses and Objections of Panasonic Corporation of North
- 25 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
- 26 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 27 (dated November 2, 2011);

- 1 • Third Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
4 (dated December 23, 2011);
- 5 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
6 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set
7 of Interrogatories (dated February 10, 2012);
- 8 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
9 Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
10 February 10, 2012);
- 11 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
12 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
13 February 10, 2012);
- 14 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
15 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
16 2012);
- 17 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct
18 Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- 19 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
20 Philips Electronics North America Corporation Responses to Direct Purchaser
21 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 22 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
23 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
24 5 (dated April 12, 2013);
- 25 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
26 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
27 April 26, 2013); and
- 28

- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

Costco expressly incorporates these responses here by reference.

Costco also refers the Defendants to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940. Costco also refers the Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, "Antitrust: Commission fines producers of TV and computer monitor

1 tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at*
 2 http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

3 Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

4 **INTERROGATORY NO. 3:**

5 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 6 that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other
 7 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 8 during the RELEVANT PERIOD.

9 **RESPONSE TO INTERROGATORY NO. 3:**

10 Costco refers to and incorporates its General Objections as if set forth fully herein.
 11 Costco further objects to this Interrogatory on the grounds that it is a premature contention
 12 interrogatory, as well as overly broad and unduly burdensome. Costco also objects that this
 13 Interrogatory is premature given that Thomson first produced documents on June 25, 2014.
 14 Costco further objects to the extent this request calls for expert testimony. Costco also objects to
 15 the extent that this request calls for information that is covered by attorney-client privilege or the
 16 work product protection. Costco further objects to the extent this request calls for information
 17 that is equally available to Thomson. Finally, Costco objects to this Interrogatory as duplicative
 18 of other discovery taken in this case.

19 Subject to and without waiving the foregoing objections, Costco states that information
 20 responsive to this Interrogatory can be found in:

- 21 • Costco’s Responses to Tatung Company of America, Inc. and Samsung Electronics
- 22 Co., Ltd.’s First Set of Interrogatories, Nos. 12-14 (dated August 17, 2012); and
- 23 • Costco’s First Supplemental Responses to Hitachi America Ltd. and Samsung SDI
- 24 Co., Ltd.’s First Set of Interrogatories, Nos. 2 and 10 (dated June 3, 2014).

25 Costco expressly incorporates those discovery responses by reference.

26 Costco also refers the Defendants to any response referencing Thomson or its personnel in
 27 the following discovery:

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 2
- 3 • Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 4
- 5 (dated November 2, 2011);
- 6
- 7 • Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
- 8
- 9 (dated December 23, 2011);
- 10
- 11 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set
- 12
- 13 of Interrogatories (dated February 10, 2012);
- 14
- 15 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
- 16 February 10, 2012);
- 17
- 18 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated
- 19 February 10, 2012);
- 20
- 21 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
- 22 2012);
- 23
- 24 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- 25
- 26 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses to Direct Purchaser
- 27 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 28

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No.
- 3 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 5 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 6 April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 8 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

9 Costco expressly incorporates these responses here by reference.

10 Costco also refers the Defendants to materials produced in this litigation at Bates Nos.

11 TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190;

12 HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526;

13 CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506;

14 SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-

15 0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814;

16 HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-

17 CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-

18 0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-

19 CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-

20 0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-

21 0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872;

22 MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-

23 0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-

24 0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-

25 0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100;

26 CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144;

27 PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-

28 CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654;

PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940. Costco also refers the Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Costco refers to and incorporates its General Objections as if set forth fully herein. Costco further objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well as overly broad and unduly burdensome. Costco also objects that this Interrogatory is premature given that Thomson first produced documents on June 25, 2014. Costco further objects to the extent this request calls for expert testimony. Costco also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Costco further objects to the extent this request calls for information that is equally available to Defendants. Finally, Costco objects to this Interrogatory as duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Costco states that information responsive to this Interrogatory can be found in the following:

- Costco’s First Supplemental Responses to Hitachi America Ltd. and Samsung SDI Co., Ltd.’s First Set of Interrogatories, Nos. 2 and 10 (dated June 3, 2014);

RESPONSE TO INTERROGATORY NO. 9:

Costco refers to and incorporates its General Objections as if set forth fully herein.

Costco further objects to this Interrogatory on the on the ground that it is overly broad, unduly burdensome, and oppressive, particularly in that it seeks the identity of every person employed by Costco over an approximately twelve-year period who was involved in negotiating and/or approving prices for the sale of CRTs. Costco also objects to this Interrogatory as duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Costco states that information responsive to this Interrogatory can be found in the following:

- Costco's Responses to Philips Electronics North America Corporation and Toshiba America Electronic Components, Inc.'s First Set of Interrogatories, Nos. 6-7 (dated August 17, 2012); and
- Costco's Responses to Hitachi Ltd.'s First Set of Interrogatories, Nos. 1-10 (dated June 5, 2014).

Costco expressly incorporates those responses here by reference. Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

INTERROGATORY NO. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 10:

Costco refers to and incorporates its General Objections as if set forth fully herein.

Costco further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive, and is not calculated to lead to the discovery of admissible evidence. Costco also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 11:

Costco refers to and incorporates its General Objections as if set forth fully herein. Costco further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive, and is not calculated to lead to the discovery of admissible evidence. Costco also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection.

Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

INTERROGATORY NO. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO INTERROGATORY NO. 12:

Costco refers to and incorporates its General Objections as if set forth fully herein. Costco further objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive. Costco also objects to the extent that this request calls for information that is covered by attorney-client privilege, work product doctrine, joint prosecution privilege, or any other privilege or doctrine of confidentiality provided by law, or that otherwise constitutes information prepared for in anticipation of litigation. Costco further objects to this Interrogatory as duplicative of prior discovery.

Subject to and without waving the foregoing objections, Costco is not certain of the date when it first learned of the conspiracy. Costco is investigating this question and if further information is located will supplement this response..

INTERROGATORY NO. 13:

Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,

1 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
2 Consumer participated in such a conspiracy regarding CDTs.

3 **RESPONSE TO INTERROGATORY NO. 13:**

4 Costco refers to and incorporates its General Objections as if set forth fully herein.
5 Costco further objects to this Interrogatory on the grounds that it is a premature contention
6 interrogatory, as well as overly broad and unduly burdensome. Costco also objects that this
7 Interrogatory is premature given that Thomson first produced documents on June 25, 2014.
8 Costco further objects to the extent this request calls for expert testimony. Costco also objects to
9 the extent that this request calls for information that is covered by attorney-client privilege or the
10 work product protection. Costco further objects to the extent this request calls for information
11 that is equally available to Thomson.

12 Subject to and without waiving the foregoing objections, Costco states that it contends
13 that Thomson Consumer participated in the conspiracy to fix the price of and/or reduce the output
14 of CDTs during the relevant period. Costco refers Defendants to its responses to Interrogatories
15 Nos. 2 and 3, which it hereby incorporates by reference. Discovery is ongoing, and Costco
16 reserves its right to supplement or modify this response.

17 **INTERROGATORY NO. 14:**

18 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
19 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
20 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
21 participated in such a conspiracy regarding CDTs.

22 **RESPONSE TO INTERROGATORY NO. 14:**

23 Costco refers to and incorporates its General Objections as if set forth fully herein.
24 Costco further objects to this Interrogatory on the grounds that it is a premature contention
25 interrogatory, as well as overly broad and unduly burdensome. Costco also objects that this
26 Interrogatory is premature given that Thomson first produced documents on June 25, 2014.
27 Costco further objects to the extent this request calls for expert testimony. Costco also objects to
28 the extent that this request calls for information that is covered by attorney-client privilege or the

1 work product protection. Costco further objects to the extent this request calls for information
2 that is equally available to Thomson.

3 Subject to and without waiving the foregoing objections, Costco states that it contends
4 that Thomson SA participated in the conspiracy to fix the price of and/or reduce the output of
5 CDTs during the relevant period. Costco refers Defendants to its responses to Interrogatories
6 Nos. 2 and 3, which it hereby incorporates by reference. Discovery is ongoing, and Costco
7 reserves its right to supplement or modify this response.

8 **INTERROGATORY NO. 15:**

9 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
10 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
11 against the Thomson Defendants.

12 **RESPONSE TO INTERROGATORY NO. 15:**

13 Costco refers to and incorporates its General Objections as if set forth fully herein.
14 Costco further objects to this Interrogatory on the grounds that it overly broad and unduly
15 burdensome. Costco also objects to the extent that this request calls for information that is
16 covered by attorney-client privilege or the work product protection. Finally, Costco objects to
17 this Interrogatory as duplicative of other discovery taken in this case, including Interrogatories
18 Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Costco refers to its responses to these Interrogatories and
19 incorporates them herein by reference.

20 Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

21 **INTERROGATORY NO. 16:**

22 Explain why YOU did not name Thomson Consumer as a defendant in your original
23 complaint, Costco Wholesale Corporation v. Hitachi, Ltd. et al., Case No. 2:11-cv-01909, filed by
24 Costco on or about November 14, 2011 in the Western District of Washington.

25 **RESPONSE TO INTERROGATORY NO. 16:**

26 Costco refers to and incorporates its General Objections as if set forth fully herein.
27 Costco further objects to this Interrogatory on the grounds that it is overly broad, unduly
28 burdensome, and oppressive, and is not calculated to lead to the discovery of admissible evidence.

1 Costco also objects to the extent that this request calls for information that is covered by attorney-
2 client privilege or the work product protection.

3 Discovery is ongoing, and Costco reserves its right to supplement or modify this response.
4

5
6 DATED: July 10, 2014

PERKINS COIE LLP

7 By: /s/ David J. Burman

8 David J. Burman (*pro hac vice*)

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22
23 29040-0318/LEGAL122096421.1
24
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26
27
28

Exhibit 14

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Master Case No. 3:07-cv-05944-SC
Individual Case No. 3:13-cv-05262

This Document Relates to:

MDL No. 1917

SEARS, ROEBUCK AND CO. & KMART CORP. v.
Technicolor SA, et al., No. 13-cv-05262

**PLAINTIFFS SEARS, ROEBUCK AND CO. &
KMART CORP.'S OBJECTIONS AND
RESPONSES TO DEFENDANTS THOMSON
SA AND THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
INTERROGATORIES**

RESPONDING PARTIES: Plaintiffs Sears, Roebuck and Co. and Kmart Corp.

PROPOUNDING PARTIES: Defendants Thomson SA and Thomson Consumer
Electronics, Inc.

SET NO.: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Rule 33.1 of the
Local Rules of the Northern District of California, Plaintiffs Sears, Roebuck and Co. and Kmart Corp.
(individually and collectively "Plaintiffs") respond to Defendants Thomson SA and Thomson
Consumer Electronics, Inc.'s (collectively "Thomson") First Set of Interrogatories served June 5,
2014 (the "Interrogatories").

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify all persons who provided information to answer these Interrogatories.

RESPONSE TO INTERROGATORY NO. 1:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Subject to and without waiving their General Objections, Plaintiffs state that responses were prepared by outside counsel. These Interrogatories consist of contention interrogatories and information responsive to these Interrogatories must be filtered through the Stipulated Protective Order that otherwise prevents Plaintiffs' outside counsel from disclosing highly confidential materials to Plaintiffs' employees. Without intending to limit the foregoing, Plaintiffs object to this Interrogatory on the grounds that it calls for information protected by the attorney-client privilege and/or work product doctrine.

INTERROGATORY NO. 2:

Identify all documents and evidence that form the basis of your allegation that Thomson Consumer participated in a conspiracy with the Defendants and/or other Conspirators to fix the price and/or reduce the output of CRTs sold in the United States during the relevant period.

RESPONSE TO INTERROGATORY NO. 2:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi) it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks

1 information that is the subject of ongoing discovery and investigation; and (viii) it seeks
2 information that is equally available to Thomson.

3 Subject to and without waiving their general and specific objections, Plaintiffs state that
4 documents and transactional data produced by them in this litigation shall be deemed produced in
5 response to this Interrogatory, subject to the Responses and Objections contained herein.
6 Additionally, the response to this Interrogatory may include the transactional data and other
7 documents produced by Defendants, co-conspirators, and third parties in MDL No. 1917. The
8 burden of identifying the specific documents responsive to this Interrogatory from review of the
9 documents and data identified in this response is substantially the same for either Plaintiffs or
10 Thomson. *See* Fed. R. Civ. P. 33(d).

11
12 Plaintiffs further state that information responsive to this Interrogatory is contained in the
13 following discovery responses, which are incorporated herein by reference:

- 14 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First
15 Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 16 • Second Supplemental Responses and Objections of Panasonic Corporation of North
17 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
18 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
19 (November 2, 2011);
- 20 • Third Supplemental Responses and Objections of Panasonic Corporation of North
21 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
22 Electric Industrial Co., Ltd.) Direct Purchaser Plaintiffs' First Set of Interrogatories
23 (December 23, 2011);
- 24 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses
25 to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories
26 (February 10, 2012);

- 1 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4
- 2 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 3 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 5 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs'
- 6 First Set of Interrogatories (February 10, 2012);
- 7 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct
- 8 Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips
- 10 Electronics North America Corporation Responses to Direct Purchaser Plaintiffs' First Set
- 11 of Interrogatories Nos. 4 and 5 (July 18, 2012);
- 12 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 13 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5
- 14 (April 12, 2013);
- 15 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to
- 16 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26,
- 17 2013); and
- 18 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set
- 19 of Interrogatories Nos. 4 and 5 (November 25, 2013).
- 20
- 21

22 Plaintiffs also refer Thomson to the following documents produced in this litigation:

23 TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-
 24 CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-
 25 0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
 26 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
 27 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774;

SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161;
SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-
CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-
0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994;
SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-
0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-
0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629;
SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-
0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-
CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-
062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-
0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681;
MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Additionally, Plaintiffs refer Thomson to the European Commission's announcement of fine
of producers of cathode ray tubes. European Commission, "Antitrust: Commission fines producers
of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012),
available at http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Plaintiffs reserve the right to supplement their response to this Interrogatory based on
further discovery, investigation, expert work, or other developments in this case.

INTERROGATORY NO. 3:

Identify all documents and evidence that form the basis of your allegation that Thomson SA
participated in a conspiracy with the Defendants and/or other conspirators to fix the price and/or
reduce the output of CRTs sold in the United States during the relevant period.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi) it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks information that is the subject of ongoing discovery and investigation; and (viii) it seeks information that is equally available to Thomson.

Subject to and without waiving their general and specific objections, Plaintiffs incorporate and restate their Response to Interrogatory No. 2. Plaintiffs reserve the right to supplement their response to this Interrogatory based on further discovery, investigation, expert work, or other developments in this case.

INTERROGATORY NO. 4:

Identify all documents and evidence that form the basis of your allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of your complaint after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information

1 that is in Thomson's possession, custody, or control, and that has not yet been provided to
 2 Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi)
 3 it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks
 4 information that is the subject of ongoing discovery and investigation; and (viii) it seeks
 5 information that is equally available to Thomson.

6 Subject to and without waiving their general and specific objections, Plaintiffs state that
 7 documents and transactional data produced by them in this litigation shall be deemed produced in
 8 response to this Interrogatory, subject to the Responses and Objections contained herein.
 9 Additionally, the response to this Interrogatory may include the transactional data and other
 10 documents produced by Defendants, co-conspirators, and third parties in MDL No. 1917. The
 11 burden of identifying the specific documents responsive to this Interrogatory from review of the
 12 documents and data identified in this response is substantially the same for either Plaintiffs or
 13 Thomson. *See* Fed. R. Civ. P. 33(d).
 14

15 Plaintiffs further state that information responsive to this Interrogatory is contained in the
 16 following:

- 17 • Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation and
 18 Sharp Electronics Manufacturing Company of America, Inc.'s First Set of Interrogatories
 19 (October 8, 2013);
- 20 • Statement of Albino Bessa Re Technologies Displays Americas, LLC (April 18, 2014);
- 21 • Answer of Thomson Consumer Electronics, Inc. to Plaintiffs' Complaint (April 25, 2014);
- 22 • Answer of Thomson SA to Plaintiffs' Complaint (April 25, 2014); and
- 23 • Answer of Technologies Displays Americas, LLC to Plaintiffs' Complaint (June 23, 2014);
- 24 • The admissions of participation in the CRT antitrust conspiracy made by Technicolor SA
 25 in its 2011 and 2012 Annual Reports.
 26

1 Plaintiffs also refer Thomson to materials produced in this litigation at Bates Nos.
2 TDA00355; MTPD-0410018; MTPD-0410020; PHLP-CRT-062325; PHLP-CRT-062493; MTPD-
3 0479672.

4 Plaintiffs reserve the right to supplement their response to this Interrogatory based on
5 further discovery, investigation, expert work, or other developments in this case.

6 **INTERROGATORY NO. 5:**

7 Identify all documents and evidence that form the basis of your allegation that Thomson
8 Consumer continued to participate in the conspiracy that is the subject of your complaint after its
9 CRT assets were sold to Videocon in July 2005.

10 **RESPONSE TO INTERROGATORY NO. 5:**

11 Plaintiffs refer to and incorporate their General Objections as if fully restated here.
12 Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that
13 this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs'
14 discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome;
15 (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information
16 that is in Thomson's possession, custody, or control, and that has not yet been provided to
17 Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi)
18 it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks
19 information that is the subject of ongoing discovery and investigation; and (viii) it seeks
20 information that is equally available to Thomson.
21

22 Subject to and without waiving their general and specific objections, Plaintiffs incorporate
23 and restate their Response to Interrogatory No. 4. Plaintiffs reserve the right to supplement their
24 response to this Interrogatory based on further discovery, investigation, expert work, or other
25 developments in this case.
26

INTERROGATORY NO. 6:

Identify all documents and evidence that form the basis of your allegation that Thomson Consumer affirmatively concealed its alleged participation in the conspiracy that is the subject of your complaint.

RESPONSE TO INTERROGATORY NO. 6:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that Thomson first produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi) it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks information that is the subject of ongoing discovery and investigation; and (viii) it seeks information that is equally available to Thomson.

Subject to and without waiving their general and specific objections, Plaintiffs state that all actions of Thomson, Defendants, and co-conspirators in furtherance of the CRT antitrust conspiracy, including unlawful exchanges with competitors of price, production, and capacity information and illegal agreements with competitors regarding prices, production, capacity, and consumer allocation, were taken in secret and deliberately concealed from customers, consumers, and interested regulatory agencies, including the United States Department of Justice and the European Commission. Thomson, Defendants, and co-conspirators fraudulently concealed the conspiracy by, among other methods, having secret meetings, using the telephone or having in-person meetings to prevent the existence of written records, having discussions on how to evade antitrust laws, devising pretextual reasons for pricing decisions, and issuing regular instructions to destroy written documentation of the conspiracy. Meeting attendees were told not to disclose the

1 fact of these meetings to outsiders or even to other employees not involved in CRT pricing or
2 production. Top executives who attended conspiracy meetings agreed to stagger their arrivals and
3 departures at such meetings to avoid being seen in public with each other and with the express
4 purpose and effect of keeping them secret. Moreover, Thomson, Defendants, and co-conspirators
5 agreed not to publicly discuss the existence of the nature of their agreements.

6 Plaintiffs reserve the right to supplement their response to this Interrogatory based on
7 further discovery, investigation, expert work, or other developments in this case.

8 **INTERROGATORY NO. 7:**

9 Identify all documents and evidence that form the basis of your allegation that Thomson SA
10 affirmatively concealed its alleged participation in the conspiracy that is the subject of your
11 complaint.
12

13 **RESPONSE TO INTERROGATORY NO. 7:**

14 Plaintiffs refer to and incorporate their General Objections as if fully restated here.
15 Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that
16 this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs'
17 discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome;
18 (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information
19 that is in Thomson's possession, custody, or control, and that has not yet been provided to
20 Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi)
21 it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks
22 information that is the subject of ongoing discovery and investigation; and (viii) it seeks
23 information that is equally available to Thomson.
24

25 Subject to and without waiving their general and specific objections, Plaintiffs incorporate
26 and restate their response to Interrogatory No. 6. Plaintiffs reserve the right to supplement their
27

1 response to this Interrogatory based on further discovery, investigation, expert work, or other
2 developments in this case.

3 **INTERROGATORY NO. 8:**

4 Identify all documents and evidence that form the basis of your allegations against the
5 Thomson Defendants contained in paragraphs 144 through 146 of your complaint.

6 **RESPONSE TO INTERROGATORY NO. 8:**

7 Plaintiffs refer to and incorporate their General Objections as if fully restated here.
8 Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that
9 this is a contention interrogatory and Thomson first produced documents in response to Plaintiffs'
10 discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome;
11 (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information
12 that is in Thomson's possession, custody, or control, and that has not yet been provided to
13 Plaintiffs; (v) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi)
14 it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks
15 information that is the subject of ongoing discovery and investigation; and (viii) it seeks
16 information that is equally available to Thomson.
17

18 Subject to and without waiving their general and specific objections, Plaintiffs incorporate
19 and restate their responses to Interrogatories 2 and 3. Plaintiffs further refer Thomson to materials
20 produced in this litigation at Bates Nos. SDCRT-0002526-2528; SDCRT-0086490-6492; SDCRT-
21 0086503; SDCRT-0086508-6510; SDCRT-0086511; SDCRT-0002488-2489; HEDUS-CRT00168774-
22 8775; SDCRT-0087662-7663; SDCRT-0087340-7342; SDCRT-0087664-7666; SDCRT-0087670-
23 7672; SDCRT-0087705-7707; MTPD-0223790-3792; SDCRT-0006632-6633; TDA02994; SDCRT-
24 0006903-6904; SDCRT-0007239; SDCRT-0007173; MTPD-0576483; SDCRT-0088635-8660; SDCRT-
25 0088661-8674; PHLP-CRT-022741-2744; TDA01365; TDA01360-61.
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INTERROGATORY NO. 10:

Identify each person employed or controlled by you who participated in your investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of your complaint.

RESPONSE TO INTERROGATORY NO. 10:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and calls for information protected by the attorney-client privilege and/or attorney work product doctrine, the joint prosecution privilege, or any other privilege or doctrine of confidentiality provided by law.

INTERROGATORY NO. 11:

Identify all documents each person identified in response to interrogatory no. 10 reviewed during your investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of your complaint.

RESPONSE TO INTERROGATORY NO. 11:

Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs further object to this Interrogatory on the grounds that: (i) it is premature given that Thomson first produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii) depending on Thomson's intent, it may call for a legal conclusion; (iv) it is duplicative of other discovery propounded by Defendants in MDL No. 1917; (vi) it seeks information that is the subject of expert opinions, reports, and/or testimony; (vii) it seeks information that is the subject of ongoing discovery and investigation; and (viii) it calls for information protected by the attorney-client privilege and/or attorney work product doctrine, the joint prosecution privilege, or any other privilege or doctrine of confidentiality provided by law.

1 **INTERROGATORY NO. 12:**

2 Identify when you first learned of the existence of the conspiracy that is the subject of your
3 complaint.

4 **RESPONSE TO INTERROGATORY NO. 12:**

5 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
6 further object to this Interrogatory on the grounds that: (i) it seeks information that is the subject
7 of ongoing discovery and investigation; and (ii) it calls for information protected by the attorney-
8 client privilege and/or attorney work product doctrine, the joint prosecution privilege, or any other
9 privilege or doctrine of confidentiality provided by law.

10
11 Plaintiffs reserve the right to supplement their response to this Interrogatory based on
12 further discovery, investigation, expert work, or other developments in this case.

13 **INTERROGATORY NO. 13:**

14 Do you contend that Thomson Consumer participated in the alleged conspiracy to fix the
15 price of and/or reduce the output of CDTs during the relevant period? If you do so contend,
16 identify all documents or evidence that support your contention that Thomson Consumer
17 participated in such a conspiracy regarding CDTs.

18 **RESPONSE TO INTERROGATORY NO. 13:**

19 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
20 further object to this Interrogatory on the grounds that: (i) it is premature given that this is a
21 contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery
22 requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii)
23 depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in
24 Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it
25 seeks information that is the subject of expert opinions, reports, and/or testimony; (vi) it seeks
26
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1 information that is the subject of ongoing discovery and investigation; and (vii) it seeks information
2 that is equally available to Thomson.

3 Subject to and without waiving their general and specific objections, Plaintiffs incorporate
4 and restate their Response to Interrogatory No. 2. Plaintiffs reserve the right to supplement their
5 response to this Interrogatory based on further discovery, investigation, expert work, or other
6 developments in this case.

7 **INTERROGATORY NO. 14:**

8 Do you contend that Thomson SA participated in the alleged conspiracy to fix the price of
9 and/or reduce the output of CDTs during the relevant period? If you do so contend, identify all
10 documents or evidence that support your contention that Thomson SA participated in such a
11 conspiracy regarding CDTs.
12

13 **RESPONSE TO INTERROGATORY NO. 14:**

14 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
15 further object to this Interrogatory on the grounds that: (i) it is premature given that this is a
16 contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery
17 requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii)
18 depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in
19 Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it
20 seeks information that is the subject of expert opinions, reports, and/or testimony; (vi) it seeks
21 information that is the subject of ongoing discovery and investigation; and (vii) it seeks information
22 that is equally available to Thomson.
23

24 Subject to and without waiving their general and specific objections, Plaintiffs incorporate
25 and restate their Response to Interrogatory No. 3. Plaintiffs reserve the right to supplement their
26 response to this Interrogatory based on further discovery, investigation, expert work, or other
27 developments in this case.

1 **INTERROGATORY NO. 15:**

2 Identify the evidence and documents you discovered and the date you discovered the
3 evidence and documents that caused you to file your complaint against the Thomson Defendants.

4 **RESPONSE TO INTERROGATORY NO. 15:**

5 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
6 further object to this Interrogatory on the grounds that: (i) it is premature given that this is a
7 contention interrogatory and Thomson first produced documents in response to Plaintiffs' discovery
8 requests on June 25, 2014; (ii) it is unreasonably overbroad and unduly burdensome; (iii)
9 depending on Thomson's intent, it may call for a legal conclusion; (iv) it seeks information that is in
10 Thomson's possession, custody, or control, and that has not yet been provided to Plaintiffs; (v) it
11 seeks information that is the subject of expert opinions, reports, and/or testimony; (vi) it seeks
12 information that is the subject of ongoing discovery and investigation; and (vii) it calls for
13 information protected by the attorney-client privilege and/or attorney work product doctrine, the
14 joint prosecution privilege, or any other privilege or doctrine of confidentiality provided by law.
15 Plaintiffs further object to this Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5,
16 6, 7, 8 and 12. Plaintiffs incorporate and restate their responses to those Interrogatories.

17
18 Plaintiffs reserve the right to supplement their response to this Interrogatory based on
19 further discovery, investigation, expert work, or other developments in this case.

20 **INTERROGATORY NO. 16:**

21 Explain why you did not name Thomson Consumer as a defendant in your original
22 complaint, *Target Corp. et al. v. Chunghwa Picture Tubes, Ltd. et al.*, Case No. 11-cv-05514, filed
23 by you on or about November 14, 2011 in the Northern District of California.

24 **RESPONSE TO INTERROGATORY NO. 16:**

25
26 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
27 further object to this Interrogatory on the grounds that it is not reasonably calculated to lead to the

1 discovery of admissible evidence and calls for information protected by the attorney-client privilege
2 and/or attorney work product doctrine, the joint prosecution privilege, or any other privilege or
3 doctrine of confidentiality provided by law.

4
5 Dated: July 10, 2014

/s/ William J. Blechman

Richard Alan Arnold, Esq. (admitted *pro hac vice*)

William J. Blechman, Esq. (admitted *pro hac vice*)

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Exhibit 15

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*Attorneys for Plaintiffs Sharp Electronics Corporation and
 Sharp Electronics Manufacturing Company of America, Inc.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC
 MDL No. 1917

This Document Relates To:

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
 et al., Case No. 13-cv-1173 (SC)*

**PLAINTIFFS SHARP ELECTRONICS
 CORPORATION AND SHARP
 ELECTRONICS MANUFACTURING
 COMPANY OF AMERICA, INC.'S
 OBJECTIONS AND RESPONSES TO
 DEFENDANTS THOMSON SA AND
 THOMSON CONSUMER
 ELECTRONICS, INC.'S FIRST SET OF
 INTERROGATORIES**

PROPOUNDING PARTY: Defendants Thomson SA (n/k/a Technicolor SA) and
 Thomson Consumer Electronics, Inc. (n/k/a Technicolor
 USA, Inc.)

RESPONDING PARTIES: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

SET NO.: One

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1 of the Local Rules of the Northern District of California, Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. (collectively, “Sharp”) hereby respond to Thomson SA and Thomson Consumer Electronics, Inc.’s (collectively, “Thomson”) First Set of Interrogatories, dated June 5, 2014 (the “Interrogatories”) as follows:

GENERAL OBJECTIONS AND RESPONSES

1. Sharp objects to the Interrogatories and the instructions therein to the extent that they seek to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of California, or any applicable order of the Court.
2. Sharp objects to the Interrogatories to the extent that they seek or call for information that is already in the possession, custody, or control of Thomson. In this regard, Sharp notes that although it sought to initiate discovery from Thomson in May 2014, Thomson SA still has not produced any documents, and has refused to produce any documents located in France without resort to the Hague Convention.
3. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Thomson from public sources.
4. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Thomson from others.
5. Sharp objects to the Interrogatories to the extent that they are unintelligible, vague, ambiguous, overly broad, unduly burdensome, and oppressive.
6. Sharp objects to the Interrogatories to the extent that they seek or call for information not in Sharp’s possession, custody, or control.

20. Sharp objects to the definition of “any” to include “all” and vice versa as vague, ambiguous, and confusing, and likely to create multiple, contradictory meanings from the same language. Sharp further objects to the definition of “any” and “all” as not reasonably limited in scope or time. Sharp uses “any” and “all” according to their ordinary meanings.

21. Any information provided in response to the Interrogatories or documents produced in connection herewith will be subject to the Stipulated Protective Order entered in this action (Dkt. No. 306).

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

Request No. 1:

IDENTIFY all PERSONS who provided information to answer these Interrogatories.

Response No. 1:

Subject to and without waiving the foregoing General Objections, Sharp refers Thomson to its responses to Panasonic Corporation and LG Electronics, Inc.’s First Set of Interrogatories, No. 1 (dated July 22, 2013).

Request No. 2:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

Response No. 2:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects that this Interrogatory is premature given that Thomson first produced documents in response to Sharp’s discovery requests on June 25, 2014. Sharp further objects to the extent this request calls for

1 expert testimony. Sharp also objects to the extent that this request calls for information that is
 2 covered by attorney-client privilege or the work product protection. Sharp further objects to the
 3 extent this request calls for information that is equally available to Thomson. Finally, Sharp
 4 objects to this Interrogatory as duplicative of other discovery taken in this case.
 5

6 Subject to and without waiving the foregoing objections, Sharp states that information
 7 responsive to this Interrogatory is contained in the following discovery:
 8

- 9 • Sharp's Responses to Hitachi Electronic Devices (USA), Inc. and Samsung SDI
 10 America, Inc.'s First Set of Interrogatories, No. 12 (dated July 22, 2013);
- 11 • Sharp Electronics Corporation's Responses to Samsung SDI America, Inc.'s First Set
 12 of Interrogatories, No. 3 (dated February 18, 2014);
- 13 • Sharp's First Supplemental Responses to Hitachi Electronic Devices (USA), Inc. and
 14 Samsung SDI America, Inc.'s First Set of Interrogatories, No. 12 (dated February 26,
 15 2014); and
- 16 • Sharp Electronics Corporation's First Supplemental Responses to Samsung SDI
 17 America, Inc.'s First Set of Interrogatories, No. 3 (dated June 18, 2014).

18 Sharp also refers the Defendants to any response referencing Thomson or its personnel in
 19 the following discovery:

- 20 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
 21 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 22 • Second Supplemental Responses and Objections of Panasonic Corporation of North
 23 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
 24 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
 25 (dated November 2, 2011);
- 26 • Third Supplemental Responses and Objections of Panasonic Corporation of North
 27 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
 28 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories
 (dated December 23, 2011);

- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 12, 2013);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated April 26, 2013); and
- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

Sharp expressly incorporates these responses here by reference.

1
2
3 Subject to and without waiving the foregoing objections, Sharp refers the Defendants to
4 the findings of the European Commission regarding the CRT antitrust conspiracy and the
5 involvement of Thomson SA in that conspiracy, including the fine assessed against Thomson
6 SA, only a summary of which is publicly available at this time. *See* European Commission,
7 “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two
8 decade-long cartels” (Dec. 5, 2012), *available at* [http://europa.eu/rapid/press-release_IP-12-](http://europa.eu/rapid/press-release_IP-12-1317_en.htm)
9 [1317_en.htm](http://europa.eu/rapid/press-release_IP-12-1317_en.htm). Sharp also refers the Defendants to the admissions of participation in the CRT
10 antitrust conspiracy made by Technicolor SA in its 2011 and 2012 Annual Reports to
11 shareholders. *See* Technicolor Annual Report 2011, *available at*
12 [file:///C:/Users/06520/Downloads/technicolor_annual_report_2011%20\(1\).pdf](file:///C:/Users/06520/Downloads/technicolor_annual_report_2011%20(1).pdf); Technicolor
13 Annual Report 2012, *available at*
14 [file:///C:/Users/06520/Downloads/technicolor_annual_report_2012%20\(2\).pdf](file:///C:/Users/06520/Downloads/technicolor_annual_report_2012%20(2).pdf).

15 Subject to and without waiving the foregoing objections, Sharp also refers the Defendants
16 to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689; HDP-
17 CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-
18 CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490;
19 SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511;
20 SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-
21 0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-
22 CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-
23 0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-
24 0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-
25 00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-
26 CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604;
27 TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-
28 0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483;
MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709;
SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992;

1 MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1;
 2
 3 MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798;
 4
 5 PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054;
 6
 7 CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-
 8
 9 037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-
 10
 11 0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-
 12
 13 0091875; CHU00033243; CHU00734336; CHU00032940.

14 Finally, Sharp refers the Defendants to the responses of all other plaintiffs, including the
 15
 16 Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action
 17
 18 Plaintiffs, to the same or substantially similar interrogatories propounded by the Thomson
 19
 20 Defendants and/or by all other defendants in the consolidated *Cathode Ray Tube (CRT) Antitrust*
 21
 22 *Litigation*.

23 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

24 **Request No. 3:**

25 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 26
 27 that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other
 28
 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 during the RELEVANT PERIOD.

Response No. 3:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
 objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well
 as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly
 requires Sharp to marshal all evidence in support of its case, including all testimony, in responses
 to written discovery, but particularly while discovery is ongoing and in advance of the applicable
 deadlines set by the Court for disclosure of pretrial information. Sharp further objects that this
 Interrogatory is premature given that Thomson first produced documents in response to Sharp's
 discovery requests on June 25, 2014. Sharp further objects to the extent this request calls for
 expert testimony. Sharp also objects to the extent that this request calls for information that is

1
2
3 covered by attorney-client privilege or the work product protection. Sharp further objects to the
4 extent this request calls for information that is equally available to Thomson. Finally, Sharp
5 objects to this Interrogatory as duplicative of other discovery taken in this case. Subject to and
6 without waiving these objections, Sharp refers to and incorporates its response to Interrogatory
7 No. 2.

8 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

9 **Request No. 4:**

10 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
11 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
12 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

13 **Response No. 4:**

14 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
15 objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well
16 as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly
17 requires Sharp to marshal all evidence in support of its case, including all testimony, in responses
18 to written discovery, but particularly while discovery is ongoing and in advance of the applicable
19 deadlines set by the Court for disclosure of pretrial information. Sharp also objects to this
20 Interrogatory as misleading to the extent that it states or implies that the CRT assets of Thomson
21 Defendants were transferred to and/or controlled by Videocon in July 2005. Sharp further
22 objects that this Interrogatory is premature given that Thomson first produced documents in
23 response to Sharp's discovery requests on June 25, 2014. Sharp further objects to the extent this
24 request calls for expert testimony. Sharp also objects to the extent that this request calls for
25 information that is covered by attorney-client privilege or the work product protection. Sharp
26 further objects to the extent this request calls for information that is equally available to
27 Defendants. Finally, Sharp objects to this Interrogatory as duplicative of other discovery taken
28 in this case.

Subject to and without waiving the foregoing objections, Sharp states that information responsive to this Interrogatory is contained in the following:

- Sharp's Responses to Hitachi Electronic Devices (USA), Inc. and Samsung SDI America, Inc.'s First Set of Interrogatories, No. 12 (dated July 22, 2013);
- Technologies Displays Americas LLC's Responses to Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s First Set of Interrogatories (dated October 8, 2013);
- Sharp Electronics Corporation's Responses to Samsung SDI America, Inc.'s First Set of Interrogatories, No. 3 (dated February 18, 2014);
- Sharp's First Supplemental Responses to Hitachi Electronic Devices (USA), Inc. and Samsung SDI America, Inc.'s First Set of Interrogatories, No. 12 (dated February 26, 2014);
- Statement of Albino Bessa Re Technologies Displays Americas, LLC (dated April 18, 2014);
- Answer of Thomson Consumer Electronics, Inc. to Sharp's First Amended Complaint (dated April 25, 2014);
- Answer of Thomson SA to Sharp's First Amended Complaint (dated April 25, 2014);
- Answer of Technologies Displays Americas, LLC to First Amended Complaint of Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.; and
- Sharp Electronics Corporation's First Supplemental Responses to Samsung SDI America, Inc.'s First Set of Interrogatories, No. 3 (dated June 18, 2014).

Sharp expressly incorporates those responses here by reference.

Subject to and without waiving the foregoing objections, Sharp also refers the Defendants to materials produced in this litigation at Bates Nos. TDA00355; MTPD-0410018; MTPD-0410020; PHLP-CRT-062325; PHLP-CRT-062493; MTPD-0479672. In addition, Sharp refers the Defendants to the following to Technicolor SA's 2011 and 2012 Annual Reports to shareholders.

Finally, Sharp refers the Defendants to the responses of all other plaintiffs, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action

1
2 Plaintiffs, to the same or substantially similar interrogatories propounded by the Thomson
3 Defendants and/or by all other defendants in the consolidated *Cathode Ray Tube (CRT) Antitrust*
4 *Litigation*.

5 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

6
7 **Request No. 5:**

8 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
9 that Thomson SA continued to participate in the conspiracy that is the subject of YOUR
10 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

11 **Response No. 5:**

12 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
13 objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well
14 as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly
15 requires Sharp to marshal all evidence in support of its case, including all testimony, in responses
16 to written discovery, but particularly while discovery is ongoing and in advance of the applicable
17 deadlines set by the Court for disclosure of pretrial information. Sharp also objects to this
18 Interrogatory as misleading to the extent that it states or implies that the CRT assets of Thomson
19 Defendants were transferred to and/or controlled by Videocon in July 2005. Sharp further
20 objects that this Interrogatory is premature given that Thomson first produced documents in
21 response to Sharp's discovery requests on June 25, 2014. Sharp further objects to the extent this
22 request calls for expert testimony. Sharp also objects to the extent that this request calls for
23 information that is covered by attorney-client privilege or the work product protection. Sharp
24 further objects to the extent this request calls for information that is equally available to
25 Defendants. Finally, Sharp objects to this Interrogatory as duplicative of other discovery taken
26 in this case.

27 Subject to and without waiving the foregoing objections, Sharp refers to and incorporates
28 its response to Interrogatory No. 4.

Request No. 6:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

Response No. 6:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the phrase “affirmatively concealed” as vague and ambiguous. Sharp further objects that this Interrogatory is premature given that Thomson first produced documents in response to Sharp’s discovery requests on June 25, 2014. Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Sharp further objects to the extent this request calls for information that is equally available to Defendants. Finally, Sharp objects to this Interrogatory as duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Sharp states that all actions of Thomson Consumer in furtherance of the CRT antitrust conspiracy, including unlawful exchanges with competitors of price, production, and capacity information and illegal agreements with competitors regarding prices, production, capacity, and customer allocation, were taken in secret and deliberately concealed from customers, consumers, and interested regulatory agencies, including the United States Department of Justice and the European Commission. Further, all public announcements regarding the prices or changes in prices of CRTs by Thomson Consumer during the CRT antitrust conspiracy were misleading and concealed the antitrust conspiracy and its impact on the prices of CRTs and CRT Products.

Subject to and without waiving the foregoing objections, Sharp states that information responsive to this Interrogatory can be found in the following discovery:

- Sharp's Responses to Hitachi Electronic Devices (USA), Inc. and Samsung SDI America, Inc.'s First Set of Interrogatories, Nos. 12 and 14 (dated July 22, 2013) and
- Sharp's First Supplemental Responses to Hitachi Electronic Devices (USA), Inc. and Samsung SDI America, Inc.'s First Set of Interrogatories, Nos. 12 and 14 (dated February 26, 2014).

Sharp expressly incorporates those responses here by reference. Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 7:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA affirmatively concealed its alleged participation in the conspiracy that is the subject of YOUR COMPLAINT.

Response No. 7:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the phrase "affirmatively concealed" as vague and ambiguous. Sharp further objects that this Interrogatory is premature given that Thomson first produced documents in response to Sharp's discovery requests on June 25, 2014. Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Sharp further objects to the extent this request calls for information that is equally available to Defendants. Finally, Sharp objects to this Interrogatory as duplicative of other discovery taken in this case.

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3 Subject to and without waiving the foregoing objections, Sharp states that all actions of
4 Thomson SA in furtherance of the CRT antitrust conspiracy, including unlawful exchanges with
5 competitors of price, production, and capacity information and illegal agreements with
6 competitors regarding prices, production, capacity, and customer allocation, were taken in secret
7 and deliberately concealed from customers, consumers, and interested regulatory agencies,
8 including the United States Department of Justice and the European Commission. Further, all
9 public announcements regarding the prices or changes in prices of CRTs by Thomson SA during
10 the CRT antitrust conspiracy were misleading and concealed the antitrust conspiracy and its
11 impact on the prices of CRTs and CRT Products.

12 Subject to and without waiving the foregoing objections, Sharp refers to and incorporates
13 its response to Interrogatory No. 6. Discovery is ongoing, and Sharp reserves its right to
14 supplement or modify this response.

15 **Request No. 8:**

16 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegations
17 against the Thomson Defendants contained in paragraphs 196 and 197 of YOUR COMPLAINT.

18 **Response No. 8:**

19 Sharp refers to and incorporates its General Objections as if set forth fully herein.¹ Sharp
20 objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well
21 as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly
22 requires Sharp to marshal all evidence in support of its case, including all testimony, in responses
23 to written discovery, but particularly while discovery is ongoing and in advance of the applicable
24 deadlines set by the Court for disclosure of pretrial information. Sharp further objects that this
25 Interrogatory is premature given that Thomson first produced documents in response to Sharp's
26 discovery requests on June 25, 2014. Sharp also objects to the extent that this request calls for
27 information that is covered by attorney-client privilege or the work product protection. Sharp

28 ¹ Sharp notes that the Thomson Defendants' Interrogatory Request No. 8 refers to paragraphs 196 and 197 of Sharp's First Amended Complaint, filed on October 28, 2013 (Dkt. No. 2030). These allegations are now contained in paragraphs 194 and 195 of Sharp's Second Amended Complaint, filed on June 13, 2014 (Dkt. No. 2621).

also objects to this Interrogatory as duplicative of other discovery propounded by defendants in this case. Finally, Sharp objects to the extent this request calls for information that is equally available to Defendants.

Subject to and without waiving the foregoing objections, Sharp states that information responsive to this Interrogatory is contained in the following discovery:

- Sharp Electronics Corporation's Objections and Responses to Samsung SDI America, Inc.'s First Set of Interrogatories (dated February 18, 2014); and
- Plaintiff Sharp Electronics Corporation's First Supplemental Responses and Objections to Defendant Samsung SDI America, Inc.'s First Set of Interrogatories (dated June 18, 2014).

With respect to the specific examples of the Thomson Defendants' participation in the CRT conspiracy set forth in paragraphs 196 and 197 of the Complaint, Sharp refers the Defendants to the following materials produced in this litigation at Bates Nos. SDCRT-0002526-2528; SDCRT-0086490-6492; SDCRT-0086503; SDCRT-0086508-6510; SDCRT-0086511; SDCRT-0002488-2489; HEDUS-CRT00168774-8775; SDCRT-0087662-7663; SDCRT-0087340-7342; SDCRT-0087664-7666; SDCRT-0087670-7672; SDCRT-0087705-7707; MTPD-0223790-3792; SDCRT-0006632-6633; TDA02994; SDCRT-0006903-6904; SDCRT-0007239; SDCRT-0007173; MTPD-0576483; SDCRT-0088635-8660; SDCRT-0088661-8674; PHLP-CRT-022741-2744; TDA01365; TDA01360-61.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 9:

IDENTIFY each PERSON employed or controlled by YOU who negotiated and/or approved YOUR purchase of CRTs from the Thomson Defendants during the RELEVANT PERIOD.

Response No. 9:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the ground that it is overly broad, unduly burdensome, and oppressive, particularly in that it seeks the identity of every person employed by Sharp over an

Request No. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

Response No. 10:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. Sharp further objects to this Interrogatory, including on the grounds that it is overly broad, unduly burdensome, and oppressive. Sharp also objects to the extent that this request seeks or calls for information that is protected from disclosure by the attorney-client privilege and/or the work product doctrine.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

Response No. 11:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it overly broad, unduly burdensome and oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. Sharp further objects to this Interrogatory as premature, as the investigation into the Thomson Defendants' participation in the CRT conspiracy is ongoing. Sharp also objects to the extent that this request seeks or calls for information that is protected from disclosure by the attorney-client privilege and/or the work product doctrine.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 12:

IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject of YOUR COMPLAINT.

Response No. 12:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp further objects to this Interrogatory on the grounds that it is overly broad. Sharp objects to this Interrogatory to the extent it seeks information protected by the attorney/client privilege and/or work product doctrine, the joint prosecution privilege, or any other privilege or doctrine of confidentiality provided by law, or that otherwise constitutes information prepared for or in anticipation of litigation.

Subject to and without waiving the foregoing objections, Sharp states that information responsive to this Interrogatory is contained in the following discovery:

- Sharp's Responses to Panasonic Corporation and LG Electronics, Inc.'s First Set of Interrogatories, No. 11 (dated July 22, 2013) and
- Sharp's First Supplemental Responses to Panasonic Corporation and LG Electronics, Inc.'s First Set of Interrogatories, No. 11 (dated March 7, 2014).

Sharp expressly incorporates those responses here by reference. Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 13:

Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson Consumer participated in such a conspiracy regarding CDTs.

Response No. 13:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well as overly broad and unduly burdensome. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request

1
2
3 calls for information that is covered by attorney-client privilege or the work product protection.
4 Sharp further objects to this Interrogatory as duplicative of other discovery taken in this case.
5 Finally, Sharp objects to the extent this request calls for information that is equally available to
6 Thomson.

7 Subject to and without waiving the foregoing objections, Sharp refers to and incorporates
8 its response to Interrogatory No. 2.

9 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

10 **Request No. 14:**

11 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
12 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
13 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
14 participated in such a conspiracy regarding CDTs.

15 **Response No. 14:**

16 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
17 objects to this Interrogatory on the grounds that it is a premature contention interrogatory, as well
18 as overly broad and unduly burdensome. Sharp further objects to the extent this request calls for
19 expert testimony. Sharp also objects to the extent that this request calls for information that is
20 covered by attorney-client privilege or the work product protection. Finally, Sharp objects to the
21 extent this request calls for information that is equally available to Thomson.

22 Subject to and without waiving the foregoing objections, Sharp refers to and incorporates
23 its response to Interrogatory No. 2.

24 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

25 **Request No. 15:**

26 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
27 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
28 against the Thomson Defendants.

Response No. 15:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp objects to this Interrogatory on the grounds that it overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Sharp also objects to the extent that this request seek and/or calls for information that is protected from disclosure by the attorney-client privilege or the work product doctrine. Finally, Sharp objects to this Interrogatory as duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Sharp responds as follows: Sharp set forth in its Complaint against the Thomson Defendants some of the evidence of their participation in the CRT conspiracy. Included in this evidence is Thomson's admission in public documents that it participated in the CRT conspiracy alleged by the European Commission and was cooperating closely with the EC in the CRT conspiracy; the European Commission's fine against Thomson SA for participation in the CRT price-fixing conspiracy; and the other documents set forth in paragraphs 196 and 197 of the Complaint. Sharp further refers to and incorporates its responses to Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

DATED: July 10, 2014

By: Craig A. Benson

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Exhibit 16

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*Attorneys for plaintiff Alfred H. Siegel, solely
 in his capacity as Trustee of the Circuit City
 Stores, Inc. Liquidating Trust*
 [additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Case No. 13-cv-05261 SC

ALFRED H. SIEGEL, AS TRUSTEE OF THE
 CIRCUIT CITY STORES, INC.
 LIQUIDATING TRUST,

Plaintiff,

v.

TECHNICOLOR SA.; et al.,

Defendants.

**RESPONSES AND OBJECTIONS OF
 ALFRED H. SIEGEL, AS TRUSTEE OF
 THE CIRCUIT CITY STORES, INC.
 LIQUIDATING TRUST, TO FIRST SET
 OF INTERROGATORIES OF
 THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS, INC.**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Alfred H.
 Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust ("Circuit City Trust" or
 "Plaintiff"), hereby responds and objects to the First Set of Interrogatories of Thomson SA and
 Thomson Consumer Electronics, Inc. (collectively the "Interrogatories" and individually an
 "Interrogatory"). For the reasons set forth below, Plaintiff generally and specifically objects and

1 action (Dkt. No. 306).

2 16. Circuit City Trust reserves its right to object to or challenge any of the
3 Interrogatories or the responses thereto as relevant or material to or admissible at the trial of this
4 case or in any hearing or motion in this case.
5

6 17. Circuit City Trust objects to the definitions of “you” and “your” on the ground that
7 they include predecessors in interest and other former entities of Circuit City, as well as former
8 officers, directors, employees, attorneys, agents, and representatives of Circuit City. Most of
9 these entities and persons no longer have any affiliation with Circuit City or the Circuit City
10 Trust, and the Circuit City Trust has no control over them, and in many instances has no
11 knowledge of their location.
12

13 **RESPONSES AND OBJECTIONS TO INTERROGATORIES**

14 **INTERROGATORY NO. 1:**

15 IDENTIFY all PERSONS who provided information to answer these Interrogatories.

16 **ANSWER:**

17 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
18 herein. Subject to and without waiving those objections, outside counsel to the Circuit City Trust
19 in this case and Brandi Fose provided information.
20

21 **INTERROGATORY NO. 2:**

22 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
23 that Thomson Consumer participated in a conspiracy with the DEFENDANTS and/or other
24 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
25 during the RELEVANT PERIOD.
26

27 **ANSWER:**

28 Circuit City Trust refers to and incorporates its General Objections as if set forth fully

1 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
2 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
3 testimony, in responses to written discovery, but particularly while discovery is ongoing and in
4 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
5 City Trust further objects to this Interrogatory as duplicative of other discovery propounded by
6 defendants in this case. Subject to and without waving these objections, Circuit City Trust states
7 that information responsive to this Interrogatory is contained in the following:
8

9 The discovery responses listed in Circuit City Trust's August 17, 2012 answer to
10 Interrogatory No. 13 of its Objections and Responses to Samsung SDI Co., Ltd. and Hitachi Asia,
11 Ltd.'s First Set of Interrogatories to Plaintiff Circuit City Trust, as well as the supplemental
12 responses submitted by defendants to the discovery responses listed in that answer, including but
13 not limited to the Second Supplemental Response of Hitachi Displays, Ltd. to Direct Purchaser
14 Plaintiffs' First Set of Interrogatories (April 12, 2013), the Second Supplemental Response of
15 Hitachi Electronic Devices (USA), Inc. to Direct Purchaser Plaintiffs' First Set of Interrogatories
16 (April 26, 2013), and Samsung SDI's Second Supplemental Response to Direct Purchaser
17 Plaintiffs' First Set of Interrogatories (November 25, 2013).
18

19 The findings of the European Commission regarding the CRT antitrust conspiracy and the
20 involvement of Thomson SA in that conspiracy, including the fine assessed against Thomson SA,
21 only a summary of which is publicly available at this time.
22

23 The responses of all other plaintiffs, including the Direct Purchaser Plaintiffs, the Indirect
24 Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
25 interrogatories propounded by the Thomson Defendants and/or by all other defendants in the
26 consolidated *Cathode Ray Tube (CRT) Antitrust Litigation*.
27

28 The admissions of participation in the CRT antitrust conspiracy made by Technicolor SA

1 in its 2011 and 2012 Annual Reports to shareholders.

2 The following documents: TDA00355; CHU00022689; ;HDP-CRT00055626; HDP-
3 CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-
4 CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500;
5 SDCRT-0086496; SDCRT-00086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514;
6 SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-
7 0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-
8 0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161;
9 SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609;
10 SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609;
11 HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-
12 CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790;
13 PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-
14 0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360;
15 MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-
16 0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-
17 008861; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-
18 0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871;
19 CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800;
20 SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-
21 062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638;
22 MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-
23 0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243;
24 CHU00734336; CHU00032940.
25
26
27
28

1 **INTERROGATORY NO. 3:**

2 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
3 that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other
4 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
5 during the RELEVANT PERIOD.
6

7 **ANSWER:**

8 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
9 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
10 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
11 testimony, in responses to written discovery, but particularly while discovery is ongoing and in
12 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
13 City Trust further objects to this Interrogatory as duplicative of other discovery propounded by
14 defendants in this case. Subject to and without waiving these objections, Circuit City Trust refers
15 to and incorporates its response to Interrogatory No. 2.
16

17 **INTERROGATORY NO. 4:**

18 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
19 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
20 COMPLAINT after its CRT assets were sold to Videocon in July 2005.
21

22 **ANSWER:**

23 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
24 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
25 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
26 testimony, in responses to written discovery, but particularly while discovery is ongoing and in
27 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
28

1 City Trust further objects to this Interrogatory as misleading to the extent it states or implies that
2 the CRT assets of the Thomson Defendants were transferred to and/or controlled by Videocon in
3 July 2005. Subject to and without waiving these objections, Circuit City Trust states that
4 information responsive to this Interrogatory is contained in the following:
5

6 Technologies Displays Americas LLC's Responses to Sharp's First Set of Interrogatories
7 (October 8, 2013).

8 Statement of Albino Bessa re Technologies Displays Americas, LLC (April 18, 2014).

9 Answer of Thomson Consumer Electronics, Inc. to Circuit City Trust's Complaint (April
10 25, 2014).

11 Answer of Thomson SA to Circuit City Trust's Complaint (April 25, 2014).

12 Answer of Technologies Displays Americas, LLC to Circuit City Trust's Complaint May
13 23, 2014).

14 Technicolor SA's 2011 and 2012 Annual Reports to shareholders.

15 The responses of all other plaintiffs, including the Direct Purchaser Plaintiffs, the Indirect
16 Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar
17 interrogatories propounded by the Thomson Defendants and/or by all other defendants in the
18 consolidated *Cathode Ray Tube (CRT) Antitrust Litigation*.
19

20 The following documents: TDA00355; MTPD0410018; MTPD0410020; PHLP-
21 CRT062325; PHLP-CRT062493; MTPD0479672.
22

23 **INTERROGATORY NO. 5:**

24 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
25 that Thomson SA continued to participate in the conspiracy that is the subject of YOUR
26 COMPLAINT after its CRT assets were sold to Videocon in July 2005.
27

28 **ANSWER:**

1 prices of CRTs by Thomson SA were misleading and concealed the antitrust conspiracy and its
2 impact on the prices of CRTs and CRT products. Circuit City Trust further refers to and
3 incorporates its response to Interrogatory No. 4.

4
5 **INTERROGATORY NO.8:**

6 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegations
7 against the Thomson Defendants contained in paragraphs 146 through 148 of YOUR
8 COMPLAINT.

9 **ANSWER:**

10 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
11 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
12 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
13 testimony, in responses to written discovery, but particularly while discovery is ongoing and in
14 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
15 City Trust further objects to this Interrogatory as duplicative of other discovery propounded by
16 defendants in this case. Subject to and without waiving these objections, Circuit City Trust refers
17 to and incorporates its responses to Interrogatories Nos. 2 and 4. With respect to the specific
18 examples of the Thomson Defendants' participation in the CRT antitrust conspiracy set forth in
19 paragraphs 146 through 148 of the Complaint, Circuit City Trust refers to the following
20 documents: SDCRT-0002526-2528; SDCRT-0086490-6492; SDCRT-0086503; SDCRT-
21 0086508-6510; SDCRT-0086511; SDCRT-0002488-2489; HEDUS-CRT00168774-8775;
22 SDCRT-0087662-7663; SDCRT-0087340-7342; SDCRT-0087664-7666; SDCRT-0087670-
23 7672; SDCRT-0087705-7707; MTPD-0223790-3792; SDCRT-0006632-6633; TDA02994;
24 SDCRT-0006903-6904; SDCRT-0007239; SDCRT-0007173; MTPD-0576483; SDCRT-
25 0088635-8660; SDCRT-0088661-8674; PHLP-CRT-022741-2744; TDA01365; TDA01360-61.
26
27
28

INTERROGATORY NO. 9:

IDENTIFY each PERSON employed or controlled by YOU who negotiated and/or approved YOUR purchase of CRTs from the Thomson Defendants during the RELEVANT PERIOD.

ANSWER:

Circuit City Trust refers to and incorporates its General Objections as if set forth fully herein. Circuit City Trust also objects to the phrase “controlled by” as vague and ambiguous. Subject to and without waiving these objections, Circuit City Trust responds as follows: None.

INTERROGATORY NO. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

ANSWER:

Circuit City Trust refers to and incorporates its General Objections as if set forth fully herein. Circuit City Trust also objects to this Interrogatory on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence. Circuit City Trust further objects to this Interrogatory as calling for information protected from disclosure by the attorney-client privilege and/or the work product doctrine.

INTERROGATORY NO. 11:

IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the subject of YOUR COMPLAINT.

ANSWER:

Circuit City Trust refers to and incorporates its General Objections as if set forth fully

1 herein. Circuit City Trust also objects to this Interrogatory on the grounds that it is overly broad,
2 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
3 evidence. Circuit City Trust further objects to this Interrogatory as premature, as the
4 investigation into the Thomson Defendants' participation in the CRT conspiracy is ongoing.
5 Circuit City Trust additionally objects to this Interrogatory as calling for information protected
6 from disclosure by the attorney-client privilege and/or the work product doctrine.
7

8 **INTERROGATORY NO. 12:**

9 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
10 of YOUR COMPLAINT.
11

12 **ANSWER:**

13 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
14 herein. Subject to and without waiving those objections, at this time Circuit City Trust is not
15 certain of the date when it first learned of the conspiracy. Circuit City Trust is investigating this
16 question and if further information is located will supplement this response.
17

18 **INTERROGATORY NO. 13:**

19 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix
20 the price of and/or reduce the output of CDTs during the relevant period? If YOU do so
21 contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that
22 Thomson Consumer participated in such a conspiracy regarding CDTs.
23

24 **ANSWER:**

25 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
26 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
27 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
28 testimony, in responses to written discovery, but particularly while discovery is ongoing and in

1 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
2 City Trust further objects to this Interrogatory as duplicative of other discovery propounded by
3 defendants in this case. Subject to and without waiving these objections, Circuit City Trust
4 responds as follows: Yes, Thomson Consumer participated in a conspiracy, among other things,
5 to fix prices and/or reduce output of all CRTs, including CDTs. Circuit City Trust further refers
6 to and incorporates its response to Interrogatory No. 2.

7
8 **INTERROGATORY NO. 14:**

9 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
10 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
11 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
12 participated in such a conspiracy regarding CDTs.

13
14 **ANSWER:**

15 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
16 herein. Circuit City Trust also objects to this Interrogatory as unduly burdensome, premature, and
17 improperly requiring Circuit City Trust to marshal all evidence in support of its case, including all
18 testimony, in responses to written discovery, but particularly while discovery is ongoing and in
19 advance of the applicable deadlines set by the Court for disclosure of pretrial information. Circuit
20 City Trust further objects to this Interrogatory as duplicative of other discovery propounded by
21 defendants in this case. Subject to and without waiving these objections, Circuit City Trust
22 responds as follows: Yes, Thomson SA participated in a conspiracy, among other things, to fix
23 prices and/or reduce output of all CRTs, including CDTs. Circuit City Trust further refers to and
24 incorporates its response to Interrogatory No. 4.

25
26
27 **INTERROGATORY NO. 15:**

28 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU

1 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
2 against the Thomson Defendants.

3 **ANSWER:**

4
5 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
6 herein. Circuit City Trust also objects to this Interrogatory on the ground that it is not reasonably
7 calculated to lead to the discovery of admissible evidence. Circuit City Trust further objects to
8 this Interrogatory as calling for information protected from discovery by the attorney-client
9 privilege and/or the work product doctrine. Subject to and without waiving these objections,
10 Circuit City Trust responds as follows: Circuit City Trust set forth in its Complaint against the
11 Thomson Defendants some of the evidence of their participation in the CRT conspiracy. Included
12 in this evidence is Technicolor SA's (formerly Thomson SA) admission in its 2011 Annual
13 Report that "it played a minor role in the alleged anticompetitive conduct"; the European
14 Commission's fine against Thomson SA of 38,631,000 Euros (reduced due to cooperation) for
15 participation in the CRT price-fixing conspiracy; and the other documents set forth in paragraphs
16 146 and 147 of the Complaint. Circuit City Trust further refers to and incorporates its response to
17 Interrogatory No. 8.
18

19
20 **INTERROGATORY NO. 16:**

21 Explain why YOU did not name the Thomson Defendants as defendants in YOUR
22 original complaint, *Siegel v. Hitachi, Ltd.*, Case No. 11-cv- 05502, filed by YOU on or about
23 November 14, 2011 in the Northern District of California.

24 **ANSWER:**

25
26 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
27 herein. Circuit City Trust also objects to this Interrogatory on the ground that it is not reasonably
28 calculated to lead to the discovery of admissible evidence. Circuit City Trust further objects to

1 this Interrogatory as seeking information protected from disclosure by the attorney-client
2 privilege and/or the work product doctrine.
3

4
5 Dated: July 10, 2014.

SUSMAN GODFREY L.L.P.

6
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24 *Attorneys for plaintiff Alfred H. Siegel, solely in*
25 *his capacity as Trustee of the Circuit City*
26 *Stores, Inc. Liquidating Trust*

VERIFICATION

The undersigned states that he has read the foregoing Responses and Objections of Alfred H. Siegel, As Trustee Of The Circuit City Stores, Inc. Liquidating Trust, to First Set of Interrogatories of Thomson SA and Thomson Consumer Electronics, Inc., that he is authorized to sign this Verification, that he is informed that no single officer of the Circuit City Liquidating Trust has personal knowledge of all matters stated in the foregoing Responses, that the facts stated in such responses have been assembled by authorized employees, agents, and/or legal representatives of the Circuit City Liquidating Trust, and that he is informed and believes that the facts stated in such responses are correct, based on the records of Circuit City and information reasonably available to its employees, agents, and/or legal representatives.

Dated: July 9, 2014

Signature:



Steve Deason

Exhibit 17

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11 *Counsel for Plaintiff Target Corp.*

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

15 IN RE CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

17 This Document Relates To:

18 *Target Corp., et al. v. Technicolor SA, et*
19 *al.*, Case No. 13-cv-05686

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 13-cv-05686

**PLAINTIFF TARGET CORP.'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS THOMSON SA AND
THOMSON CONSUMER ELECTRONICS,
INC.'S FIRST SET OF
INTERROGATORIES**

23 PROPOUNDING PARTY: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

24 RESPONDING PARTY: Plaintiff Target Corp.

25 SET NO.: ONE

26 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Target
27 Corp. ("Target") hereby responds to the First Set of Interrogatories to Plaintiff Target
28 ("Interrogatories") served by counsel for Defendants Thomson SA and Thomson Consumer

1 Target also objects to this Interrogatory on the ground that it seeks information not calculated to
 2 lead to the discovery of admissible evidence. Target further objects to the extent that the
 3 Interrogatory seeks information protected by the attorney-client privilege or work-product
 4 doctrine.

5 **INTERROGATORY NO. 2:**

6 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
 7 that Thomson Consumer participated in a conspiracy with the DEFENDANTS and/or other
 8 CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States
 9 during the RELEVANT PERIOD.

10 **RESPONSE TO INTERROGATORY NO. 2:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
 12 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome,
 13 particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants
 14 only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014.
 15 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 16 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 17 seeks information protected by the attorney-client privilege or work-product doctrine. Target also
 18 objects to this Interrogatory to the extent it seeks information equally available to Defendants.

19 Subject to and without waiving any of the foregoing objections, Target states that
 20 information responsive to this Interrogatory is located in the following discovery responses,
 21 documents, and information:

- 22 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
 23 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 24 • Second Supplemental Responses and Objections of Panasonic Corporation of North
 25 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
 26 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
 27 Interrogatories (dated November 2, 2011);

- 1 • Third Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (dated December 23, 2011);
- 5 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
6 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
7 Interrogatories (dated February 10, 2012);
- 8 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory
9 Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
10 February 10, 2012);
- 11 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to
12 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5
13 (dated February 10, 2012);
- 14 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
15 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
16 2012);
- 17 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
18 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March
19 21, 2012);
- 20 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
21 Philips Electronics North America Corporation Responses to Direct Purchaser
22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 23 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
24 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
25 No. 5 (dated April 12, 2013);
- 26 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
27 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
28 April 26, 2013); and

- Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013).

Target also refers Defendants to documents produced in this litigation at Bates Nos.:

TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Target also refers the Defendants to the admissions of participation in the CRT antitrust conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders and the findings of the European Commission regarding the CRT antitrust conspiracy and Thomson

SA's involvement therein, including the fines assessed against Thomson SA. European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Moreover, Target incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all Defendants in the MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome, particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

Subject to and without waiving any of the foregoing objections, Target states that information responsive to this Interrogatory is located in the following discovery responses, documents, and information:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- 1 • Second Supplemental Responses and Objections of Panasonic Corporation of North
2 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
3 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (dated November 2, 2011);
- 5 • Third Supplemental Responses and Objections of Panasonic Corporation of North
6 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita
7 Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories (dated December 23, 2011);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (dated February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory
13 Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
14 February 10, 2012);
- 15 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to
16 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5
17 (dated February 10, 2012);
- 18 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
19 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10,
20 2012);
- 21 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March
23 21, 2012);
- 24 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
25 Philips Electronics North America Corporation Responses to Direct Purchaser
26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
27
28

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
- 3 No. 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response
- 5 to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (dated
- 6 April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs' First
- 8 Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013).

9 Target also refers Defendants to documents produced in this litigation at Bates Nos.:

10 TDA00355; CHU00022689; HDP-CRT00055626; HDP-CRT00055593; HDP-
 11 CRT00055190; HEDUS-CRT00126627; HDP-CRT00055091; HDP-CRT00055172; SDCRT-
 12 0002526; CHU00123746; SDCRT-0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-
 13 0086506; SDCRT-0086508; SDCRT-0086511; SDCRT-0086514; SDCRT-0086233;
 14 TDA00705; SDCRT-0087301; SDCRT-0002506; SDCRT-0087334; SDCRT-0002488;
 15 HEDUS-CRT00164814; HEDUS-CRT00164816; HEDUS-CRT00168774; SDCRT-0087336;
 16 SDCRT-0087662; HEDUS-CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-
 17 0087667; CHU00031136; SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-
 18 CRT00026209; SDCRT-0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413;
 19 SDCRT-0087705; LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372;
 20 TDA02994; SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-
 21 0088713; SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375;
 22 SDCRT-0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084;
 23 MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661;
 24 MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077;
 25 SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040;
 26 PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-
 27 0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325;
 28 PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-

0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Target also refers the Defendants to the admissions of participation in the CRT antitrust conspiracy included in Thomson SA's 2011 and 2012 Annual Reports to shareholders and the findings of the European Commission regarding the CRT antitrust conspiracy and Thomson SA's involvement therein, including the fines assessed against Thomson SA. European Commission, "Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Moreover, Target incorporates by reference the responses of all other plaintiffs in this matter, including the Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action Plaintiffs, to the same or substantially similar interrogatories propounded by all Defendants in the MDL. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 4:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR COMPLAINT after its CRT assets were sold to Videocon in July 2005.

RESPONSE TO INTERROGATORY NO. 4:

Target refers to and incorporates its General Objections as though set forth fully herein. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome, particularly since the Interrogatory seeks every piece of evidence despite the fact that Defendants only first produced documents in response to Plaintiffs' discovery requests on June 25, 2014. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine. Target also objects to this Interrogatory to the extent it seeks information equally available to Defendants.

documents, and information:

SDCRT-0002526-2528; SDCRT-0086490-6492; SDCRT-0086503; SDCRT-0086508-6510; SDCRT-0086511; SDCRT-0002488-2489; HEDUS-CRT00168774-8775; SDCRT-0087662-7663; SDCRT-0087340-7342; SDCRT-0087664-7666; SDCRT-0087670-7672; SDCRT-0087705-7707; MTPD-0223790-3792; SDCRT-0006632-6633; TDA02994; SDCRT-0006903-6904; SDCRT-0007239; SDCRT-0007173; MTPD-0576483; SDCRT-0088635-8660; SDCRT-0088661-8674; PHLP-CRT-022741-2744; TDA01365; TDA01360-61.

Target also refers Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

INTERROGATORY NO. 9:

IDENTIFY each PERSON employed or controlled by YOU who negotiated and/or approved YOUR purchase of CRTs from the Thomson Defendants during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 9:

Target refers to and incorporates its General Objections as though set forth fully herein. Target also objects to this Interrogatory on the ground that it seeks information not calculated to lead to the discovery of admissible evidence. Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome. Target further objects to this Interrogatory on the grounds that the terms “controlled by,” “negotiated,” and “approved” are vague and ambiguous. Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants in this case. Target further objects to the extent that the Interrogatory seeks information protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving any of the foregoing objections, Target states that it did not purchase standalone CRTs.

INTERROGATORY NO. 10:

IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR investigation into whether the Thomson Defendants participated in the conspiracy that is the

1 subject of YOUR COMPLAINT.

2 **RESPONSE TO INTERROGATORY NO. 10:**

3 Target refers to and incorporates its General Objections as though set forth fully herein.
 4 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 5 Target further objects to this Interrogatory on the grounds that the terms “controlled by,”
 6 “participated in,” and “investigation” are vague and ambiguous. Target also objects to this
 7 Interrogatory to the extent that it is duplicative of other interrogatories served by other defendants
 8 in this case. Target further objects to the extent that the Interrogatory seeks information protected
 9 by the attorney-client privilege or work-product doctrine.

10 **INTERROGATORY NO. 11:**

11 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory
 12 No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated
 13 in the conspiracy that is the subject of YOUR COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Target refers to and incorporates its General Objections as though set forth fully herein.
 16 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 17 Target further objects to this Interrogatory on the ground that the terms “reviewed” and
 18 “investigation” are vague and ambiguous. Target also objects to this Interrogatory to the extent
 19 that it is duplicative of other interrogatories served by other defendants in this case. Target
 20 further objects to the extent that the Interrogatory seeks information protected by the attorney-
 21 client privilege or work-product doctrine.

22 **INTERROGATORY NO. 12:**

23 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
 24 of YOUR COMPLAINT.

25 **RESPONSE TO INTERROGATORY NO. 12:**

26 Target refers to and incorporates its General Objections as though set forth fully herein.
 27 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 28 Target further objects to this Interrogatory on the ground that the terms “learned of” and

1 “existence” are vague and ambiguous. Target also objects to this Interrogatory to the extent that
 2 it is duplicative of other interrogatories served by other defendants in this case. Target further
 3 objects to the extent that the Interrogatory seeks information protected by the attorney-client
 4 privilege or work-product doctrine.

5 **INTERROGATORY NO. 13:**

6 Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the
 7 price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 8 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson
 9 Consumer participated in such a conspiracy regarding CDTs.

10 **RESPONSE TO INTERROGATORY NO. 13:**

11 Target refers to and incorporates its General Objections as though set forth fully herein.
 12 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 13 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 14 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 15 seeks information protected by the attorney-client privilege or work-product doctrine. Target
 16 further objects to this Interrogatory on the ground that it seeks information not reasonably
 17 calculated to lead to the discovery of admissible evidence in that the CRT conspiracy covered
 18 both CDTs and CPTs. Target also objects to this Interrogatory on the ground that it calls for a
 19 legal conclusion. Target further objects to the extent that the Interrogatory seeks information
 20 protected by the attorney-client privilege or work-product doctrine.

21 Subject to and without waiving any of the foregoing objections, Target states that
 22 Defendants’ unlawful CRT conspiracy encompassed both CPT and CDT. Target also refers
 23 Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target
 24 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

25 **INTERROGATORY NO. 14:**

26 Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price
 27 of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,
 28 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA

1 participated in such a conspiracy regarding CDTs.

2 **RESPONSE TO INTERROGATORY NO. 14:**

3 Target refers to and incorporates its General Objections as though set forth fully herein.
 4 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 5 Target also objects to this Interrogatory to the extent that it is duplicative of other interrogatories
 6 served by other defendants in this case. Target further objects to the extent that the Interrogatory
 7 seeks information protected by the attorney-client privilege or work-product doctrine. Target
 8 further objects to this Interrogatory on the ground that it seeks information not reasonably
 9 calculated to lead to the discovery of admissible evidence in that the CRT conspiracy covered
 10 both CDTs and CPTs. Target also objects to this Interrogatory on the ground that it calls for a
 11 legal conclusion. Target further objects to the extent that the Interrogatory seeks information
 12 protected by the attorney-client privilege or work-product doctrine.

13 Subject to and without waiving any of the foregoing objections, Target states that
 14 Defendants' unlawful CRT conspiracy encompassed both CPT and CDT. Target also refers
 15 Defendants to its responses to Interrogatory Nos. 2 and 3. Discovery is ongoing and Target
 16 reserves the right to supplement and/or amend its response to this Interrogatory as appropriate.

17 **INTERROGATORY NO. 15:**

18 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
 19 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
 20 against the Thomson Defendants.

21 **RESPONSE TO INTERROGATORY NO. 15:**

22 Target refers to and incorporates its General Objections as though set forth fully herein.
 23 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
 24 Target further objects to this Interrogatory on the ground that the terms "discovered" and
 25 "caused" are vague and ambiguous. Target also objects to this Interrogatory to the extent that it is
 26 duplicative of other interrogatories served by other defendants in this case. Target also objects to
 27 this Interrogatory on the ground that it is duplicative of Interrogatory Nos. 2-8 and 12. Target
 28 further objects to the extent that the Interrogatory seeks information protected by the attorney-

1 client privilege or work-product doctrine.

2 **INTERROGATORY NO. 16:**

3 Explain why YOU did not name Thomson Consumer as a defendant in your original
4 complaint, *Target Corp et al. v. Chunghwa Picture Tubes, Ltd. et al.*, Case No. 11-cv-05514, filed
5 by YOU on or about November 14, 2011 in the Northern District of California.

6 **RESPONSE TO INTERROGATORY NO. 16:**

7 Target refers to and incorporates its General Objections as though set forth fully herein.
8 Target further objects to this Interrogatory as premature, overbroad, and unduly burdensome.
9 Target also objects to this Interrogatory on the ground that it seeks information not calculated to
10 lead to the discovery of admissible evidence. Target also objects to this Interrogatory to the
11 extent that it is duplicative of other interrogatories served by other defendants in this case. Target
12 further objects to the extent that the Interrogatory seeks information protected by the attorney-
13 client privilege or work-product doctrine.

14
15 DATED: July 10, 2014

By: /s/ Astor H.L. Heaven

16 Jason C. Murray (CA Bar No. 169806)
17 Robert B. McNary (CA Bar No. 253745)
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19 515 South Flower St., 40th Floor
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21 Jerome A. Murphy (*pro hac vice*)
22 Astor H.L. Heaven (*pro hac vice*)
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25 Washington, D.C. 20004
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Counsel for Target Corp.

Exhibit 18

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*Counsel for Plaintiffs Tech Data Corporation
and Tech Data Product Management, Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

CASE No. 13-CV-00157-SC

Master File No. 07-5944 SC (N.D. Cal.)

This Document Relates to Individual Case
No. 13-CV-00157-SC

MDL No. 1917

TECH DATA CORPORATION; TECH
DATA PRODUCT MANAGEMENT,
INC.,

**TECH DATA CORPORATION AND
TECH DATA PRODUCT
MANAGEMENT, INC.'S RESPONSES
AND OBJECTIONS TO THOMSON
CONSUMER ELECTRONICS, INC.'S
FIRST SET OF INTERROGATORIES**

Plaintiffs,
vs.

AU OPTRONICS CORPORATION; *et al.*

Defendants.

PROPOUNDING PARTIES: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

RESPONDING PARTIES: Tech Data Corporation and Tech Data Product Management, Inc.

SET: One

Plaintiffs, Tech Data Corporation and Tech Data Product Management, Inc. (“Tech Data”), Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1 of the Local Civil Rules of the Northern District of California, hereby provides its responses to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s (“Defendants”) First Set of Interrogatories to Plaintiff dated June 6, 2014 (the “Interrogatories”), as follows:

GENERAL OBJECTIONS

1. The following general objections (“General Objections”) are incorporated into Tech Data’s responses to each and every interrogatory contained in the Interrogatories. No response to any interrogatory shall be deemed a waiver of Tech Data’s General Objections.

2. Tech Data objects to the Interrogatories to the extent the information sought is protected from discovery by the attorney-client privilege, the work product doctrine, or any other applicable privileges or doctrines. Tech Data hereby asserts such privileges and protections to the extent implicated by each interrogatory, and will exclude privileged and protected information from its responses to the Interrogatories. Any disclosure of such protected or privileged information is inadvertent, and is not intended to waive those privileges or protections.

3. Tech Data objects to the Interrogatories to the extent that the “Instructions” incorporated therein attempt to impose obligations on Tech Data beyond those imposed or authorized by the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of California, the Orders of the Court, or other applicable law.

4. Tech Data objects to the Interrogatories to the extent that they seek disclosure of information that is already in the possession, custody or control of the Defendants.

RESPONSE TO INTERROGATORY NO. 2:

Tech Data refers to and incorporates its General Objections as if set forth fully herein. Tech Data further objects that this Interrogatory is premature given that Defendants first produced documents on June 25, 2014. Tech Data further objects to the extent this request calls for expert testimony. Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Tech Data further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Tech Data further objects to the extent this request calls for information that is equally available to Defendants.

Subject to and without waiving its General Objections, and the foregoing objections, Tech Data states that information responsive to this Interrogatory can be found in the following discovery:

- Plaintiff ABC Appliance, Inc.'s Responses to Toshiba America Information Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all supplemental responses thereto; and
- Plaintiff ABC Appliance, Inc.'s Responses to Samsung Electronics America, Inc.'s, Tatung Company of America, Inc.'s, Toshiba America Electronic Components, Inc.'s, and Philips Electronics North America Corporation's First Set of Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

Tech Data also refers Defendants to any response referencing Thomson or its personnel in the following:

- Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);

- Second Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated November 2, 2011);
- Third Supplemental Responses and Objections of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories (dated December 23, 2011);
- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated February 10, 2012);
- Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February 10, 2012);
- Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March 21, 2012);
- Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);

- 1 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
- 2 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
- 3 No. 5 (dated April 12, 2013);
- 4 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental
- 5 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
- 6 No. 5 (dated April 26, 2013); and
- 7 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs'
- 8 First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

9 Tech Data expressly incorporates these discovery responses by reference.

10 Tech Data also refers Defendants to the responses of all other plaintiffs, including the
 11 Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action
 12 Plaintiffs, to the same or substantially similar interrogatories propounded by the Thomson
 13 Defendants and/or by all other defendants in the consolidated *Cathode Ray Tube (CRT) Antitrust*
 14 *Litigation*.

15 Subject to and without waiving the foregoing objections, Tech Data also refers
 16 Defendants to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689;
 17 HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627;
 18 HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-
 19 0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-
 20 0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-
 21 0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-
 22 CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-
 23 CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136;
 24 SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-
 25 0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705;
 26 LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994;
 27 SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713;
 28 SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-

0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998; SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018; MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681; MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336; CHU00032940.

Tech Data also refers the Defendants to European Commission announcement of fine of producers of cathode ray tubes. European Commission, “Antitrust: Commission fines producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels” (Dec. 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 3:

IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation that Thomson SA participated in a conspiracy with the DEFENDANTS and/or other CONSPIRATORS to fix the price and/or reduce the output of CRTs sold in the United States during the RELEVANT PERIOD.

RESPONSE TO INTERROGATORY NO. 3:

Tech Data refers to and incorporates its General Objections as if set forth fully herein. Tech Data further objects that this Interrogatory is premature given that Thomson first produced documents on June 25, 2014. Tech Data further objects to the extent this request calls for expert testimony. Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the

1 Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3,
 2 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
 3 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
 4 1128. Tech Data further objects to the extent that this request calls for information that is
 5 covered by attorney-client privilege or the work product protection. Tech Data further objects
 6 to the extent this request calls for information that is equally available to Defendants.

7 Subject to and without waiving its General Objections, and the foregoing objections,
 8 Tech Data states that information responsive to this Interrogatory can be found in the following
 9 discovery:

- 10 • Plaintiff ABC Appliance, Inc.'s Responses to Toshiba America Information
 11 Systems, Inc.'s First Set of Interrogatories and Philips Electronics North America
 12 Corporation's Third Set of Interrogatories, Nos. 1, 2, and 9, including all
 13 supplemental responses thereto; and
- 14 • Plaintiff ABC Appliance, Inc.'s Responses to Samsung Electronics America, Inc.'s,
 15 Tatung Company of America, Inc.'s, Toshiba America Electronic Components,
 16 Inc.'s, and Philips Electronics North America Corporation's First Set of
 17 Interrogatories, Nos. 12 and 14, including all supplemental responses thereto.

18 Tech Data also refers Defendants to any response referencing Thomson or its personnel
 19 in the following:

- 20 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
 21 First Set of Interrogatories Nos. 4 and 5 (dated October 17, 2011);
- 22 • Second Supplemental Responses and Objections of Panasonic Corporation of North
 23 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a
 24 Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
 25 Interrogatories (dated November 2, 2011);
- 26 • Third Supplemental Responses and Objections of Panasonic Corporation of North
 27 America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a
 28

1 Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (dated December 23, 2011);

- 3 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
4 Responses to Interrogatory Nos. Four and Five of Direct Purchaser Plaintiffs' First
5 Set of Interrogatories (dated February 10, 2012);
- 6 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory
7 Nos. Four and Five of Direct Purchaser Plaintiffs' First Set of Interrogatories (dated
8 February 10, 2012);
- 9 • Defendant Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to
10 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5
11 (dated February 10, 2012);
- 12 • Defendant Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser
13 Plaintiffs' First Set of Interrogatories, Interrogatory Nos. 4 and 5 (dated February
14 10, 2012);
- 15 • Responses and Objections of Defendant Koninklijke Philips Electronics N.V. to
16 Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated March
17 21, 2012);
- 18 • Responses and Objections of Defendants Koninklijke Philips Electronics N.V. and
19 Philips Electronics North America Corporation Responses to Direct Purchaser
20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (dated July 18, 2012);
- 21 • Defendant Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental
22 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
23 No. 5 (dated April 12, 2013);
- 24 • Defendant Hitachi Electronic Devices (USA), Inc.'s Second Supplemental
25 Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory
26 No. 5 (dated April 26, 2013); and
- 27 • Samsung SDI Defendants' Second Supplemental to Direct Purchaser Plaintiffs'
28 First Set of Interrogatories Nos. 4 and 5 (dated November 25, 2013);

1 Tech Data expressly incorporates these discovery responses by reference.

2 Tech Data also refers Defendants to the responses of all other plaintiffs, including the
3 Direct Purchaser Plaintiffs, the Indirect Purchaser Plaintiffs, and all other Direct Action
4 Plaintiffs, to the same or substantially similar interrogatories propounded by the Thomson
5 Defendants and/or by all other defendants in the consolidated *Cathode Ray Tube (CRT)*
6 *Antitrust Litigation*.

7 Subject to and without waiving the foregoing objections, Tech Data also refers
8 Defendants to materials produced in this litigation at Bates Nos. TDA00355; CHU00022689;
9 HDP-CRT00055626; HDP-CRT00055593; HDP-CRT00055190; HEDUS-CRT00126627;
10 HDP-CRT00055091; HDP-CRT00055172; SDCRT-0002526; CHU00123746; SDCRT-
11 0086490; SDCRT-0086500; SDCRT-0086496; SDCRT-0086506; SDCRT-0086508; SDCRT-
12 0086511; SDCRT-0086514; SDCRT-0086233; TDA00705; SDCRT-0087301; SDCRT-
13 0002506; SDCRT-0087334; SDCRT-0002488; HEDUS-CRT00164814; HEDUS-
14 CRT00164816; HEDUS-CRT00168774; SDCRT-0087336; SDCRT-0087662; HEDUS-
15 CRT00188826; SDCRT-0087340; CHU00121161; SDCRT-0087667; CHU00031136;
16 SDCRT-0002582; SDCRT-0087664; SDCRT-0087609; HDP-CRT00026209; SDCRT-
17 0087670; PHLP-CRT-095826; JLJ-00004807; HDP-CRT00004413; SDCRT-0087705;
18 LPD_00042916; MTPD-0223790; PHLP-CRT-010790; PHLP-CRT-087372; TDA02994;
19 SDCRT-0006632; SDCRT-0088604; TDA01365; SDCRT-0006903; SDCRT-0088713;
20 SDCRT-0007239; MTPD-0013872; MTPD-0011066; TDA01360; MTPD-0035375; SDCRT-
21 0007173; MTPD-0426070; MTPD-0576483; MTPD-0314102; MTPD-0184084; MTPD-
22 0426066; SDCRT-0088629; SDCRT-0005709; SDCRT-0088635; SDCRT-0088661; MTPD-
23 0026563; MTPD-0043577; MTPD-0014992; MTPD-0573840; SDCRT-0090077; SDCRT-
24 0090098; SDCRT-0090100; CHU00123358.1; MTPD-0580871; CHU00030040; PHLP-CRT-
25 022741; SDCRT-0090144; PHLP-CRT069798; PHLP-CRT069800; SDCRT-0002998;
26 SDCRT-0002984; HEDUS-CRT00161054; CHU00125257; PHLP-CRT-062325; PHLP-CRT-
27 062493; PHLP-CRT-037654; PHLP-CRT-037940; SDCRT-0016638; MTPD-0410018;
28 MTPD-0410020; SDCRT-0007240; MTPD-0479599; MTPD-0468623; MTPD-0479681;

1 MTPD-0479670; SDCRT-0091871; SDCRT-0091875; CHU00033243; CHU00734336;
2 CHU00032940.

3 Tech Data also refers the Defendants to European Commission announcement of fine of
4 producers of cathode ray tubes. European Commission, "Antitrust: Commission fines
5 producers of TV and computer monitor tubes € 1.47 billion for two decade-long cartels" (Dec.
6 5, 2012), *available at* http://europa.eu/rapid/press-release_IP-12-1317_en.htm.

7 Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its
8 response to this Interrogatory.

9 **INTERROGATORY NO. 4:**

10 IDENTIFY all DOCUMENTS and EVIDENCE that form the basis of YOUR allegation
11 that Thomson Consumer continued to participate in the conspiracy that is the subject of YOUR
12 COMPLAINT after its CRT assets were sold to Videocon in July 2005.

13 **RESPONSE TO INTERROGATORY NO. 4:**

14 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
15 Tech Data further objects that this Interrogatory is premature given that Thomson first
16 produced documents on June 25, 2014. Tech Data further objects to the extent this request
17 calls for expert testimony. Tech Data further objects to the extent that this request calls for
18 information that is covered by attorney-client privilege or the work product protection. Tech
19 Data further objects to the extent this request calls for information that is equally available to
20 Defendants.

21 Subject to and without waiving Tech Data's General Objections, and the foregoing
22 objections, Tech Data states that information responsive to this Interrogatory can be found in
23 the following discovery:

- 24 • Technologies Displays Americas LLC's Responses to Sharp Electronics
25 Corporation and Sharp Electronics Manufacturing Company of America, Inc.'s First
26 Set of Interrogatories (dated October 8, 2013);
- 27 • Statement of Albino Bessa Re Technologies Displays Americas, LLC (dated April
28 18, 2014);

1 Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its
2 response to this Interrogatory.

3 **INTERROGATORY NO. 10:**

4 IDENTIFY each PERSON employed or controlled by YOU who participated in YOUR
5 investigation into whether the Thomson Defendants participated in the conspiracy that is the
6 subject of YOUR COMPLAINT.

7 **RESPONSE TO INTERROGATORY NO. 10:**

8 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
9 Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories,
10 in whole or in part, made by other defendants in this matter, in violation of the integration order
11 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
12 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
13 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
14 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Tech Data further objects to the
15 extent that this request calls for information that is covered by attorney-client privilege or the
16 work product protection.

17 **INTERROGATORY NO. 11:**

18 IDENTIFY all DOCUMENTS each PERSON IDENTIFIED in Response to Interrogatory
19 No. 10 reviewed during YOUR investigation into whether the Thomson Defendants participated
20 in the conspiracy that is the subject of YOUR COMPLAINT.

21 **RESPONSE TO INTERROGATORY NO. 11:**

22 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
23 Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories,
24 in whole or in part, made by other defendants in this matter, in violation of the integration order
25 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
26 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
27 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
28 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Tech Data further objects to the

1 extent that this request calls for information that is covered by attorney-client privilege or the
2 work product protection.

3 **INTERROGATORY NO. 12:**

4 IDENTIFY when YOU first learned of the existence of the conspiracy that is the subject
5 of YOUR COMPLAINT.

6 **RESPONSE TO INTERROGATORY NO. 12:**

7 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
8 Tech Data further objects that this Interrogatory is premature given that Thomson first
9 produced documents on June 25, 2014. Tech Data further objects to the extent this request
10 calls for expert testimony. Tech Data further objects to this Interrogatory because it is
11 duplicative of other interrogatories, in whole or in part, made by other defendants in this
12 matter, in violation of the integration order included in section XV, subsections D and E of the
13 Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3,
14 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
15 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
16 1128. Tech Data further objects to the extent that this request calls for information that is
17 covered by attorney-client privilege or the work product protection. Tech Data further objects
18 to the extent this request calls for information that is equally available to Defendants.

19 Subject to and without waiving its General Objections, and the foregoing objections,
20 Tech Data states that information responsive to this Interrogatory can be found in Tech Data's
21 Responses And Objections To Panasonic Corporation And Hitachi Electronic Devices (USA),
22 Inc.'S First Set Of Interrogatories, No. 13. Tech Data further states that Defendants
23 fraudulently concealed their conspiratorial acts from Tech Data.

24 Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its
25 response to this Interrogatory.

INTERROGATORY NO. 13:

Do YOU contend that Thomson Consumer participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend, IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson Consumer participated in such a conspiracy regarding CDTs.

RESPONSE TO INTERROGATORY NO. 13:

Tech Data refers to and incorporates its General Objections as if set forth fully herein. Tech Data further objects that this Interrogatory is premature given that Thomson first produced documents on June 25, 2014. Tech Data further objects to the extent this request calls for expert testimony. Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Tech Data further objects to this Interrogatory to the extent that it calls for a legal conclusion or legal argumentation. Tech Data further objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Tech Data further objects to the extent this request calls for information that is equally available to Defendants.

Subject and without waiving its General Objections and the foregoing objections, Tech Data refers Thomson to its responses to Interrogatories Nos. 2 and 3.

Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its response to this Interrogatory.

INTERROGATORY NO. 14:

Do YOU contend that Thomson SA participated in the alleged conspiracy to fix the price of and/or reduce the output of CDTs during the relevant period? If YOU do so contend,

1 IDENTIFY all DOCUMENTS or EVIDENCE that support YOUR contention that Thomson SA
2 participated in such a conspiracy regarding CDTs.

3 **RESPONSE TO INTERROGATORY NO. 14:**

4 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
5 Tech Data further objects that this Interrogatory is premature given that Thomson first
6 produced documents on June 25, 2014. Tech Data further objects to the extent this request
7 calls for expert testimony. Tech Data further objects to this Interrogatory because it is
8 duplicative of other interrogatories, in whole or in part, made by other defendants in this
9 matter, in violation of the integration order included in section XV, subsections D and E of the
10 Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3,
11 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
12 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
13 1128. Tech Data further objects to this Interrogatory to the extent that it calls for a legal
14 conclusion or legal argumentation. Tech Data further objects to the extent that this request
15 calls for information that is covered by attorney-client privilege or the work product protection.
16 Tech Data further objects to the extent this request calls for information that is equally
17 available to Defendants.

18 Subject to and without waiving its General Objections and the foregoing objections,
19 Tech Data refers Thomson to its responses to Interrogatories Nos. 2 and 3.

20 Discovery is ongoing and Tech Data reserves the right to supplement and/or amend its
21 response to this Interrogatory.

22 **INTERROGATORY NO. 15:**

23 IDENTIFY the EVIDENCE and DOCUMENTS YOU discovered and the date YOU
24 discovered the EVIDENCE and DOCUMENTS that caused YOU to file YOUR COMPLAINT
25 against the Thomson Defendants.

26 **RESPONSE TO INTERROGATORY NO. 15:**

27 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
28 Tech Data further objects to this Interrogatory because it is duplicative of other interrogatories,

1 in whole or in part, made by other defendants in this matter, in violation of the integration order
 2 included in section XV, subsections D and E of the Court's "Order Re Discovery and Case
 3 Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case
 4 Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC
 5 MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Tech Data further objects to this
 6 Interrogatory as wholly duplicative of Interrogatories Nos. 2, 3, 4, 5, 6, 7, 8 and 12. Tech Data
 7 further objects to the extent that this request calls for information that is covered by attorney-
 8 client privilege or the work product protection.

9 **INTERROGATORY NO. 16:**

10 Explain why YOU did not name Thomson Consumer as a defendant in your original
 11 complaint in this matter, *Tech Data v. Hitachi, Ltd., et al.*, Case No. 8:12-cv-02795, filed by Tech
 12 Data on or about December 12, 2012 in the Middle District of Florida.

13 **RESPONSE TO INTERROGATORY NO. 16:**

14 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
 15 Tech Data further objects to this Interrogatory as seeking information not reasonably calculated
 16 to lead to the discovery of admissible evidence. Tech Data further objects to this Interrogatory
 17 because it is irrelevant to any claim or defense in this litigation. Tech Data further objects to
 18 the extent that this request calls for information that is covered by attorney-client privilege or
 19 the work product protection.

20 //

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28 //

1 Dated: July 15, 2014

/s/Scott N. Wagner

2 ROBERT W. TURKEN
3 SCOTT N. WAGNER
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*Counsel for Plaintiffs Tech
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Management, Inc.*

Exhibit 19

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 15 *Depot, Inc., Interbond Corporation of America, P.C. Richard & Son Long Island Corporation,*
 16 *MARTA Cooperative of America, Inc., ABC Appliance, Inc., and Schultze Agency Services LLC*
on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

19 In re: CATHODE RAY TUBE (CRT)
 20 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC (N.D. Cal.)
 MDL No. 1917

21 This document relates to:

22 *Schultze Agency Services, LLC v. Technicolor*
 23 *SA, et al.*, No. 13-cv-05668;

24 *Electrograph Systems, Inc., et al. v.*
Technicolor SA, et al., No. 13-cv-05724;

25 *P.C. Richard & Son Long Island Corporation,*
 26 *et al. v. Technicolor SA, et al.*, No. 13-cv-
 05725;

27 *Office Depot, Inc., v. Technicolor SA, et al.,*
 28 *No. 13-cv-05726;*

PLAINTIFFS' OBJECTIONS AND RESPONSES TO
 THOMSON SA AND THOMSON CONSUMER
 ELECTRONICS, INC.'S FIRST SET OF REQUESTS
 FOR PRODUCTION

**ELECTROGRAPH SYSTEMS, INC.,
 ELECTROGRAPH TECHNOLOGIES,
 CORP., OFFICE DEPOT, INC.,
 INTERBOND CORPORATION OF
 AMERICA, P.C. RICHARD & SON LONG
 ISLAND CORPORATION, MARTA
 COOPERATIVE OF AMERICA, INC.,
 ABC APPLIANCE, INC., AND SCHULTZE
 AGENCY SERVICES, LLC
 ("TWEETER")'S OBJECTIONS AND
 RESPONSES TO THOMSON SA AND
 THOMSON CONSUMER ELECTRONICS,
 INC.'S FIRST SET OF REQUESTS FOR**

Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727

PRODUCTION OF DOCUMENTS

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1 **PROPOUNDING PARTIES:** Thomson SA and Thomson Consumer Electronics, Inc.

2 **RESPONDING PARTIES:** Electrograph Systems, Inc. and Electrograph Technologies

3 Corp.; Office Depot, Inc.; Interbond Corporation of America;

4 P.C. Richard & Son Long Island Corporation, MARTA

5 Cooperative of America, Inc., and ABC Appliance, Inc.; and

6 Schultze Agency Services, LLC on behalf of Tweeter Opco,

7 LLC and Tweeter Newco, LLC

8 **SET:** One

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1 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
2 1128. Plaintiffs further object to this Request to the extent that it calls for the production of
3 documents or information equally available to Defendants. Plaintiffs further object to this
4 Request to the extent that it calls for the production of documents or information not relevant,
5 material or necessary to this action and, thus, not reasonably calculated to lead to the discovery
6 of admissible evidence.

7 Subject to and notwithstanding the foregoing objections, Plaintiffs state that they are
8 willing to meet and confer with Defendants regarding this Request.

9 **REQUEST NO. 3:**

10 All DOCUMENTS related to when YOU investigated, or attempted to investigate, the
11 existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

12 **RESPONSE TO REQUEST NO. 3:**

13 Plaintiffs refer to and incorporate their General Objections as if set forth fully herein.
14 Plaintiffs further object to this Request on the grounds that it is overly broad, unduly
15 burdensome, and oppressive. Plaintiffs further object to this Request because it is duplicative of
16 other discovery requests, in whole or in part, made by other defendants in this matter, in
17 violation of the integration order included in section XV, subsections D and E of the Court's
18 "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012.
19 Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
20 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
21 1128. Plaintiffs further object to the extent that this request calls for information that is covered
22 by attorney-client privilege or the work product protection. Plaintiffs further object to this
23 Request to the extent that it calls for the production of documents or information not relevant,
24 material or necessary to this action and, thus, not reasonably calculated to lead to the discovery
25 of admissible evidence.

26 **REQUEST NO. 4:**

27 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
28 conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO REQUEST NO. 4:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive. Plaintiffs further object to this Request because it is duplicative of other discovery requests, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Plaintiffs further object to this Request to the extent that it calls for the production of documents or information not relevant, material or necessary to this action and, thus, not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 5:

All DOCUMENTS related to estimates of the production capacity, output, and/or prices charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

RESPONSE TO REQUEST NO. 5:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs further object to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive. Plaintiffs further object to this Request because it is duplicative of other discovery requests, in whole or in part, made by other defendants in this matter, in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Plaintiffs further object to this Request to the extent that it calls for the production of documents or information equally available to Defendants. Plaintiffs further object to this

RESPONSE TO REQUEST NO. 11:

Plaintiffs refer to and incorporate their General Objections as if set forth fully herein. Plaintiffs specifically object to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive. Plaintiffs further object to this Request to the extent that it seeks or calls for the production of documents protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other privilege, protection, or immunity applicable under the governing law. Plaintiffs further object to this Request on the grounds that it is premature, and that it seeks to impose an undue burden on Plaintiffs to state their entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation, many months before the agreed-upon fact discovery deadline. Plaintiffs also object to this Request to the extent that it calls for the production of documents or information not relevant, material or necessary to this action and, thus, not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and notwithstanding the foregoing objections, Plaintiffs state that they will produce any responsive, non-privileged, previously-unproduced documents referenced in their Responses to Defendants' First Set of Interrogatories.

DATED: July 10, 2014

/s/ Philip J. Iovieno

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Services LLC on behalf of Tweeter Opco, LLC and
Tweeter Newco, LLC,*

Exhibit 20

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SERVICES, INC.; BEST BUY STORES, L.P.;
BESTBUY.COM, LLC; MAGNOLIA HI-FI, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. M:07-5994-SC
MDL No. 1917

This Document Relates to
Individual Case No. 3:11-cv-05264-SC

Case No. 3:13-cv-05264-SC

BEST BUY CO., INC.; BEST BUY
PURCHASING LLC; BEST BUY
ENTERPRISE SERVICES, INC.; BEST BUY
STORES, L.P.; BESTBUY.COM, L.L.C.; and
MAGNOLIA HI-FI, LLC,

Plaintiffs,

v.

TECHNICOLOR SA (f/k/a THOMSON SA),
TECHNICOLOR USA, INC. (f/k/a
THOMSON CONSUMER ELECTRONICS,
INC.), VIDEOCON INDUSTRIES, LTD.,
TECHNOLOGIES DISPLAYS AMERICAS
LLC (f/k/a THOMSON DISPLAYS
AMERICAS LLC), MITSUBISHI ELECTRIC
CORPORATION; MITSUBISHI ELECTRIC
VISUAL SOLUTIONS AMERICA, INC.; and
MITSUBISHI ELECTRIC & ELECTRONICS
USA, INC.,

Defendants.

**BEST BUY'S OBJECTIONS AND
RESPONSES TO DEFENDANTS
THOMSON SA AND THOMSON
CONSUMER ELECTRONICS,
INC.'S FIRST SET OF REQUESTS
FOR PRODUCTION OF
DOCUMENTS**

PROPOUNDING PARTIES: THOMSON SA AND THOMSON CONSUMER ELECTRONICS, INC.

RESPONDING PARTY: BEST BUY CO., INC.; BEST BUY PURCHASING LLC; BEST BUY ENTERPRISE SERVICES, INC.; BEST BUY STORES, L.P.; BESTBUY.COM, L.L.C.; and MAGNOLIA HI-FI, INC.

SET NO.: FIRST

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

GENERAL OBJECTIONS

Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc.

(collectively "Best Buy") assert and incorporate by reference the following General Objections to each Request for Production of Document ("Request(s)"). Reference to these General Objections in any specific Request shall not waive or otherwise limit the applicability of these General Objections to each and every Request.

1. Best Buy construes Defendants' Requests as served on behalf of all defendants named in the Complaint ("Defendants") and responds and objects accordingly.

2. Best Buy objects to Defendants' "Definitions" to the extent that they impose burdens and obligations on Best Buy greater than or different from those authorized under the Federal Rules of Civil Procedure and the Local Rules of this Court and to the extent they purport to give meanings to words different from their ordinary English meaning or definitions set forth in the applicable statutes or rules.

3. Best Buy objects to each Request to the extent that it calls for information protected by the attorney-client privilege, or that may be protected by any other privilege, such as a joint defense or common interest privilege.

4. Best Buy objects to each Request to the extent that it seeks work product information or documents prepared by Best Buy or its representatives or in furtherance of any joint defense or common interest in anticipation of litigation or for trial.

1 it has produced documents sufficient to show communications regarding its purchases
2 of CRT Products from the Thomson Defendants.

3 **Request for Production No. 3:**

4 All DOCUMENTS related to when YOU investigated, or attempted to investigate,
5 the existence of the alleged antitrust conspiracy that is the subject of YOUR
6 COMPLAINT.

7 **Response:**

8 In addition to Best Buy's General Objections, which Best Buy hereby incorporates
9 by reference, Best Buy specifically objects to this Request on the grounds that it is
10 overbroad, and unduly burdensome. Best Buy further objects that this Request calls for
11 documents protected by the attorney client privilege and/or work product protection.

12 **Request for Production No. 4:**

13 All DOCUMENTS related to when YOU learned of the existence of the alleged
14 antitrust conspiracy that is the subject of YOUR COMPLAINT.

15 **Response:**

16 In addition to Best Buy's General Objections, which Best Buy hereby incorporates
17 by reference, Best Buy specifically objects to this Request on the grounds that it is
18 overbroad, and unduly burdensome. Best Buy further objects that this Request calls for
19 documents protected by the attorney client privilege and/or work product protection.

20 **Request for Production No. 5:**

21 All DOCUMENTS related to estimates of the production capacity, output, and/or
22 prices charged by the DEFENDANTS for CRTs and/or CRT Products during the
23 Relevant Period.

24 **Response:**

25 In addition to Best Buy's General Objections, which Best Buy hereby incorporates
26 by reference, Best Buy specifically objects to this Request on the grounds that it is
27 overbroad, unduly burdensome, and seeks information that is not relevant to any claim
28 or defense in this case. Best Buy further objects that this Request calls for production of

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

discovery propounded against Best Buy.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

DATED: July 7, 2014

By: /s/ Laura E. Nelson
Roman M. Silberfeld
David Martinez
Laura E. Nelson

**ATTORNEYS FOR PLAINTIFFS
BEST BUY CO., INC.; BEST BUY PURCHASING
LLC; BEST BUY ENTERPRISE SERVICES, INC.;
BEST BUY STORES, L.P.; BESTBUY.COM, LLC;
MAGNOLIA HI-FI, INC.**

Exhibit 21

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Attorneys for Plaintiff
Costco Wholesale Corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In Re CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

No. 07-cv-05944-SC

MDL No. 1917

This Document Relates To:

*Costco Wholesale Corp. v. Hitachi, Ltd.,
 et al.*, No 3:11-cv-06397-SC

**COSTCO WHOLESALE CORPORATION'S
 OBJECTIONS AND RESPONSES TO
 THOMSON SA AND THOMSON
 CONSUMER ELECTRONICS, INC.'S
 FIRST SET OF REQUEST FOR
 PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTY: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

RESPONDING PARTY: Costco Wholesale Corporation

SET NO.: One

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Costco refers to and incorporates its General Objections as if set forth fully herein.

Costco also objects to this Request, including the time frame for the Request, on the grounds that it is overly broad, unduly burdensome and oppressive. Costco further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work-product doctrine, and/or any other protection or privilege. Costco further objects to this Request on the ground that it is duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Costco refers Defendants to and incorporates by reference Costco's response to Request No. 26 of Philips Electronics North America Corp. and Toshiba America Electronic Components, Inc.'s First Requests for Production of Documents, dated August 17, 2012. Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

REQUEST FOR PRODUCTION NO. 4:

All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Costco refers to and incorporates its General Objections as if set forth fully herein.

Costco also objects to this Request, including the time frame for the Request, on the grounds that it is overly broad, unduly burdensome and oppressive. Costco further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work-product doctrine, and/or any other protection or privilege. Costco further objects to this Request on the ground that it is duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Costco refers Defendants to and incorporates by reference Costco's response to Request No. 26 of Philips Electronics North America Corp. and Toshiba America Electronic Components, Inc.'s First Requests for Production of Documents, dated August 17, 2012. Discovery is ongoing, and Costco reserves its right to supplement or modify this response.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the Thomson Defendants' First Set of Interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Costco refers to and incorporates its General Objections as if set forth fully herein. Subject to and without waiving the foregoing objections, Costco refers to and incorporates its objections and responses to the Thomson Defendants' First Set of Interrogatories.

DATED: July 10, 2014

PERKINS COIE LLP

By: /s/ David J. Burman

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29040-0318/LEGAL122095860.1

Exhibit 22

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Master Case No. 3:07-cv-05944-SC
Individual Case No. 3:13-cv-05262

This Document Relates to:

MDL No. 1917

SEARS, ROEBUCK AND CO. & KMART CORP. v.
Technicolor SA, et al., No. 13-cv-05262

**PLAINTIFFS SEARS, ROEBUCK AND CO. &
KMART CORP.'S OBJECTIONS AND
RESPONSES TO DEFENDANTS THOMSON
SA AND THOMSON CONSUMER
ELECTRONICS, INC.'S FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

RESPONDING PARTIES: Plaintiffs Sears, Roebuck and Co. and Kmart Corp.

PROPOUNDING PARTIES: Defendants Thomson SA and Thomson Consumer
Electronics, Inc.

SET NO.: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Rule 33.1 of the
Local Rules of the Northern District of California, Plaintiffs Sears, Roebuck and Co. and Kmart Corp.
(individually and collectively "Plaintiffs") respond to Defendants Thomson SA and Thomson
Consumer Electronics, Inc.'s (collectively "Thomson") First Set of Requests for Production of
Documents served June 5, 2014 (the "Requests").

1 **REQUEST FOR PRODUCTION NO. 3:**

2 All documents related to when you investigated, or attempted to investigate, the existence
3 of the alleged antitrust conspiracy that is the subject of your complaint.

4 **RESPONSE TO REQUEST NO. 3:**

5 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
6 further object to this Request on the grounds that: (i) it is premature given that Thomson first
7 produced documents in response to Plaintiffs' discovery requests on June 25, 2014; (ii) it is
8 unreasonably overbroad and unduly burdensome seeking documents that relate to thousands of
9 purchases and sales of CRTs and/or CRT Products over an approximate 12-year period; (iii) it seeks
10 documents that are in Thomson's possession, custody, or control, and that have not yet been
11 provided to Plaintiffs; (iv) it is duplicative of other discovery propounded by Defendants in MDL No.
12 1917; (v) it seeks documents that are the subject of ongoing discovery and investigation; (vi) it
13 seeks documents that are equally available to Thomson; and (vii) it seeks documents that are
14 protected by the attorney client privilege, the attorney work product doctrine, or any other available
15 privilege or protection.
16

17 **REQUEST FOR PRODUCTION NO. 4:**

18 All documents related to when you learned of the existence of the alleged antitrust
19 conspiracy that is the subject of your complaint.

20 **RESPONSE TO REQUEST NO. 4:**

21 Plaintiffs refer to and incorporate their General Objections as if fully restated here. Plaintiffs
22 further object to this Request on the grounds that: (i) it seeks documents that are the subject of
23 ongoing discovery and investigation; (ii) it is duplicative of other discovery propounded by
24 Defendants in MDL No. 1917; and (iii) it seeks documents that are protected by the attorney client
25 privilege, the attorney work product doctrine, or any other available privilege or protection.
26
27

1 Dated: July 10, 2014

/s/ William J. Blechman

Richard Alan Arnold, Esq. (admitted *pro hac vice*)

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC
 MDL No. 1917

This Document Relates To:

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
 et al., Case No. 13-cv-1173 (SC)*

**PLAINTIFFS SHARP ELECTRONICS
 CORPORATION AND SHARP
 ELECTRONICS MANUFACTURING
 COMPANY OF AMERICA, INC.'S
 OBJECTIONS AND RESPONSES TO
 DEFENDANTS THOMSON SA AND
 THOMSON CONSUMER
 ELECTRONICS, INC.'S FIRST SET OF
 REQUESTS FOR PRODUCTION OF
 DOCUMENTS**

PROPOUNDING PARTY:

Defendants Thomson SA (n/k/a Technicolor SA) and
 Thomson Consumer Electronics, Inc. (n/k/a Technicolor
 USA, Inc.)

RESPONDING PARTIES: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

SET NO.: One

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rule 34.1 of the Local Rules of the Northern District of California, Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc. (collectively, “Sharp”) hereby respond to Thomson SA and Thomson Consumer Electronics, Inc.’s (collectively, “Thomson”) First Set of Requests for Production of Documents dated June 5, 2014 (the “Requests for Production”) as follows:

GENERAL OBJECTIONS AND RESPONSES

The following general objections (“General Objections”) are incorporated in Sharp’s responses (“Responses”) to each and every Document Request contained in the Requests for Production. No Response to any Request for production shall be deemed a waiver of Sharp’s General Objections.

1. Sharp objects to the Requests for Production to the extent that they seek to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of California, or any applicable order of the Court.
2. Sharp objects to the Requests for Production to the extent that they seek or call for the production of documents or information that is already in the possession, custody, or control of Thomson. In this regard, Sharp notes that although it sought to initiate discovery from Thomson in May 2014, Thomson SA still has not produced any documents, and has refused to produce any documents located in France without resort to the Hague Convention.
3. Sharp objects to the Requests for Production to the extent that they seek or call for the production of documents or information that can equally or more readily be obtained by Thomson from public sources.

Request No. 2:

All DOCUMENTS which reflect communications during the RELEVANT PERIOD between YOU and the Thomson Defendants regarding CRTs and/or CRT Products that you have not previously produced in this litigation to another DEFENDANT.

Response No. 2:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Request on the grounds that it is overly broad, unduly burdensome and oppressive, is duplicative of other requests including at least Request Nos. 1 and 5, seeks documents in the possession of or equally available to the Defendants, and is not calculated to lead to the discovery of admissible evidence. Sharp further objects to this Request on the ground that it is duplicative of other discovery taken in this case.

Subject to and without waiving the foregoing objections, Sharp states that information responsive to this Request can be found in Sharp's responses to Request Nos. 5 and 6 of Panasonic and LGE's First Set of Requests for Production, dated July 22, 2013. Sharp expressly incorporates those responses here by reference. Sharp has not excluded from its production documents relating to Thomson, and so all such non-privileged documents located by reasonable search responsive to outstanding requests (as modified by Sharp's objections and limitations) have been or are being produced, subject to and without waiver of Sharp's objections.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 3:

All DOCUMENTS related to when YOU investigated, or attempted to investigate, the existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

Response No. 3:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Request, including the time frame for the Request, on the grounds that it is overly broad, unduly burdensome and oppressive. Sharp further objects to this Request on the grounds that it seeks information that is protected by the attorney-client privilege, the work

1
2
3 product doctrine, and/or any other protection or privilege. Sharp further objects to this Request
4 on the ground that it is duplicative of other discovery taken in this case.

5 Subject to and without waiving the foregoing objections, Sharp states that information
6 responsive to this Request can be found in Sharp's responses to Request No. 27 of Panasonic and
7 LGE's First Set of Requests for Production, dated July 22, 2013. Sharp expressly incorporates
8 those responses here by reference.

9 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

10 **Request No. 4:**

11 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
12 conspiracy that is the subject of YOUR COMPLAINT.

13 **Response No. 4:**

14 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
15 also objects to this Request, including the time frame for the Request, on the grounds that it is
16 overly broad, unduly burdensome and oppressive, and is not calculated to lead to the discovery
17 of admissible evidence. Sharp further objects to this Request on the grounds that it seeks
18 information that is protected by the attorney-client privilege, the work product doctrine, and/or
19 any other protection or privilege. Sharp further objects to this Request on the ground that it is
20 duplicative of other discovery taken in this case.

21 Subject to and without waiving the foregoing objections, Sharp states that information
22 responsive to this Request can be found in Sharp's responses to Request No. 25 of Panasonic and
23 LGE's First Set of Requests for Production, dated July 22, 2013. Sharp expressly incorporates
24 those responses here by reference.

25 Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

26 **Request No. 5:**

27 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
28 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

documents relating to Thomson, and so all such non-privileged documents located by reasonable search responsive to outstanding requests (as modified by Sharp's objections and limitations) have been or are being produced, subject to and without waiver of Sharp's objections.

Discovery is ongoing, and Sharp reserves its right to supplement or modify this response.

Request No. 11:

All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the Thomson Defendants' First Set of Interrogatories to YOU.

Response No. 11:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Subject to and without waiving the foregoing objections, Sharp refers to and incorporates its answers to the Interrogatories.

DATED: July 10, 2014

By: Craig A. Benson

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*Attorneys for plaintiff Alfred H. Siegel, solely
 in his capacity as Trustee of the Circuit City
 Stores, Inc. Liquidating Trust*
 [additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Case No. 13-cv-05261 SC

ALFRED H. SIEGEL, AS TRUSTEE OF THE
 CIRCUIT CITY STORES, INC.
 LIQUIDATING TRUST,

Plaintiff,

v.

TECHNICOLOR SA.; et al.,

Defendants.

**RESPONSES AND OBJECTIONS OF
 ALFRED H. SIEGEL, AS TRUSTEE OF
 THE CIRCUIT CITY STORES, INC.
 LIQUIDATING TRUST, TO FIRST
 REQUEST FOR PRODUCTION OF
 DOCUMENTS FROM THOMSON SA
 AND THOMSON CONSUMER
 ELECTRONICS, INC.**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff Alfred H. Siegel, as
 Trustee of the Circuit City Stores, Inc. Liquidating Trust ("Circuit City Trust" or "Plaintiff"),
 hereby responds and objects to the First Set of Requests for Production of Thomson SA and
 Thomson Consumer Electronics, Inc. (collectively the "Requests" and individually a "Request").
 For the reasons set forth below, Plaintiff generally and specifically objects and otherwise

1 previously produced responsive documents to defendants in this litigation, which have been made
2 available to the Thomson Defendants. To the extent additional documents, if any exist, are
3 located, they will be produced.
4

5 **REQUEST FOR PRODUCTION NO .2:**

6 All DOCUMENTS which reflect communications during the RELEVANT PERIOD
7 between YOU and the Thomson Defendants regarding CRTs and/or CRT Products that you have not
8 previously produced in this litigation to another DEFENDANT.

9 **RESPONSE:**

10 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
11 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
12 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
13 evidence. Subject to and without waiving these objections, Circuit City Trust previously
14 produced responsive documents to the defendants in this litigation, which have been made
15 available to the Thomson Defendants. To the extent additional documents, if any exist, are
16 located, they will be produced.
17

18 **REQUEST FOR PRODUCTION NO .3:**

19 All DOCUMENTS related to when YOU investigated, or attempted to investigate, the
20 existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

21 **RESPONSE:**

22 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
23 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
24 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
25 evidence. Circuit City Trust additionally objects to this Request to the extent it calls for the
26 production of documents protected by the attorney-client privilege or the work product doctrine.
27
28

1 Circuit City Trust further objects to the terms and phrases “investigated,” “attempted to
2 investigate,” and “relates to” as vague and ambiguous.

3
4 **REQUEST FOR PRODUCTION NO. 4:**

5 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
6 conspiracy that is the subject of YOUR COMPLAINT.

7 **RESPONSE:**

8 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
9 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
10 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
11 evidence. Circuit City Trust further objects to the phrase “related to” as vague and ambiguous.
12 Subject to and without waiving these objections, Circuit City Trust previously produced
13 documents to the defendants in this litigation, which have been made available to the Thomson
14 Defendants. To the extent additional documents are located, if any exist, they will be produced.

15
16 **REQUEST FOR PRODUCTION NO. 5:**

17 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
18 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

19 **RESPONSE:**

20 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
21 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
22 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
23 evidence. Circuit City Trust further objects to the phrase “related to” as vague and ambiguous.
24 Subject to and without waiving these objections, Circuit City Trust previously produced
25 documents to the defendants in this litigation, which have been made available to the Thomson
26 Defendants. To the extent additional documents are located, if any exist, they will be produced.
27
28

1 extent additional documents are located, if any exist, they will be produced.

2 **REQUEST FOR PRODUCTION NO. 11:**

3 All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the
4 Thomson Defendants' First Set of Interrogatories to YOU.

5 **RESPONSE:**

6
7 Circuit City Trust refers to and incorporates its General Objections as if set forth fully
8 herein. Circuit City Trust also objects to this Request on the grounds that it is overly broad,
9 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
10 evidence. Subject to and without waiving these objections, to the extent that documents which
11 have not previously been produced to defendants in this litigation are referred to in Circuit City
12 Trust's responses to the Thomson Defendants' First Set of Interrogatories they will be produced.
13

14
15 Dated: July 10, 2014.

SUSMAN GODFREY L.L.P.

16
17 By: 

18 Kenneth S. Marks

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his capacity as Trustee of the Circuit City
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11 *Counsel for Plaintiff Target Corp.*

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

15 IN RE CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

17 This Document Relates To:

18 *Target Corp., et al. v. Technicolor SA, et*
19 *al.*, Case No. 13-cv-05686

Master File No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 13-cv-05686

**PLAINTIFF TARGET CORP.'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS THOMSON SA AND
THOMSON CONSUMER ELECTRONICS,
INC.'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

23 PROPOUNDING PARTY: Defendants Thomson SA and Thomson Consumer Electronics, Inc.

24 RESPONDING PARTY: Plaintiff Target Corp.

25 SET NO.: ONE

26 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Target
27 Corp. ("Target") hereby objects to the First Requests for Production of Documents to Target,
28 ("Requests") served by counsel for Defendants Thomson SA and Thomson Consumer

1 produced, subject to and without waiver of Target's objections. Discovery is ongoing, and Target
 2 reserves the right to supplement or modify its response.

3 **REQUEST FOR PRODUCTION NO. 3:**

4 All DOCUMENTS related to when YOU investigated, or attempted to investigate, the
 5 existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

7 Target refers to and incorporates its General Objections as though set forth fully herein.
 8 Target further objects to this Request to the extent that it is duplicative of other requests served by
 9 other defendants in this case. Target also objects to this Request on the ground that the terms
 10 "related to," "investigated," and "attempted to investigate" are vague and ambiguous. Target also
 11 objects to this Request on the ground that it seeks documents that are not relevant to the claims or
 12 defenses of any party, and is not reasonably calculated to lead to the discovery of admissible
 13 evidence. Target further objects to the extent that the Request seeks information protected by the
 14 attorney-client privilege or work-product doctrine.

15 **REQUEST FOR PRODUCTION NO. 4:**

16 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
 17 conspiracy that is the subject of YOUR COMPLAINT.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

19 Target refers to and incorporates its General Objections as though set forth fully herein.
 20 Target further objects to this Request to the extent that it is duplicative of other requests served by
 21 other defendants in this case. Target also objects to this Request on the ground that the terms
 22 "related to" and "learned" are vague and ambiguous. Target further objects to the extent that the
 23 Request seeks information protected by the attorney-client privilege or work-product doctrine.

24 Subject to and without waiving any of the foregoing objections, Target has produced
 25 responsive information at Bates Numbers TARG_CRT00000001 - TARG_CRT00031479.
 26 Target did not exclude documents relating to Thomson from its production. So all non-privileged
 27 documents located by reasonable search, and responsive to outstanding requests have been
 28 produced, subject to and without waiver of Target's objections. Discovery is ongoing, and Target

1 reserves the right to supplement or modify its response.

2 **REQUEST FOR PRODUCTION NO. 5:**

3 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
4 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

6 Target refers to and incorporates its General Objections as though set forth fully herein.
7 Target further objects to this Request to the extent that it is duplicative of other requests served by
8 other defendants in this case. Target also objects to this Request on the ground that the terms
9 “estimates,” “production capacity,” and “output” are vague and ambiguous. Target further
10 objects to the extent that the Request seeks information protected by the attorney-client privilege
11 or work-product doctrine. Target further objects to the Request to the extent it seeks documents
12 in the possession of or equally available to the defendants.

13 Subject to and without waiving any of the foregoing objections, Target has produced
14 responsive information at Bates Numbers TARG_CRT00000001 - TARG_CRT00031479.
15 Target did not exclude documents relating to Thomson from its production. So all non-privileged
16 documents located by reasonable search, and responsive to outstanding requests have been
17 produced, subject to and without waiver of Target’s objections. Discovery is ongoing, and Target
18 reserves the right to supplement or modify its response.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 All DOCUMENTS reflecting transaction level data YOU maintained in the ordinary
21 course of business regarding YOUR purchase of CRTs and CRT Products from each Thomson
22 Defendant during the Relevant Period. Please include information regarding the Thomson
23 Defendant from which you purchased the product, the date YOU purchased the product from the
24 Thomson Defendant, the entity that paid for the product, the model number/product code of the
25 product purchased, the quantity of the product purchased, the price YOU paid the Thomson
26 Defendant for the product, any rebates, discounts, credits, and/or price adjustments YOU received
27 in connection with each transaction, the entity to whom the product was initially shipped by the
28 Thomson Defendant, and the location at which the product was initially physically received by

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Target refers to and incorporates its General Objections as though set forth fully herein.

Target further objects to this Request to the extent that it is duplicative of other requests served by other defendants in this case. Target also objects to this Request on the ground that the terms “relate to” and “output” are vague and ambiguous. Target further objects to the extent that the Request seeks information protected by the attorney-client privilege or work-product doctrine.

Target further objects to the Request to the extent it seeks documents in the possession of or equally available to the defendants.

Subject to and without waiving any of the foregoing objections, Target refers Defendants to its responses to Thomson Defendants’ First Set of Interrogatories to Target.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS referred to in or relied upon to prepare YOUR responses to the Thomson Defendants’ First Set of Interrogatories to YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Target refers to and incorporates its General Objections as though set forth fully herein.

Target further objects to this Request to the extent that it is duplicative of other requests served by other defendants in this case. Target also objects to this Request on the ground that the terms “referred to” and “relied upon” are vague and ambiguous. Target further objects to the extent that the Request seeks information protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving any of the foregoing objections, Target refers Defendants to its responses to Thomson Defendants First Set of Interrogatories to Target.

DATED July 10, 2014

By: /s/ Astor H.L. Heaven

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14 *and Tech Data Product Management, Inc.*

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **(SAN FRANCISCO DIVISION)**

17 In re: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

CASE No. 13-CV-00157-SC

Master File No. 07-5944 SC (N.D. Cal.)

19 This Document Relates to Individual Case
20 No. 13-CV-00157-SC

MDL No. 1917

21 TECH DATA CORPORATION; TECH
22 DATA PRODUCT MANAGEMENT,
23 INC.,

23 Plaintiffs,
24 vs.

25 AU OPTRONICS CORPORATION; *et al.*

26 Defendants.

**TECH DATA CORPORATION AND TECH
DATA PRODUCT MANAGEMENT, INC.'S
RESPONSES AND OBJECTIONS TO
THOMSON SA AND THOMSON
CONSUMER ELECTRONICS, INC.'S FIRST
SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS**

1 Plaintiffs Tech Data Corporation and Tech Data Product Management, Inc. (“Tech
2 Data”) respond to Defendants Thomson SA and Thomson Consumer Electronics, Inc.’s
3 (collectively, “Defendants”) First Set of Requests for Production of Documents dated June 5,
4 2014 (the “Requests”), as follows:

5 **GENERAL OBJECTIONS**

6 The following general objections (“General Objections”) are incorporated in Tech Data’s
7 responses (“Responses”) to each and every request for production contained in the Requests for
8 Production. No Response to any request for production shall be deemed a waiver of Tech Data’s
9 General Objections.

10 1. Tech Data objects to the Requests for Production to the extent that they seek to
11 impose obligations on Tech Data beyond those imposed by the Federal Rules of Civil Procedure,
12 the Local Civil Rules of the Northern District of California, or any applicable order of this Court.

13 2. Tech Data objects to the Requests for Production to the extent that they seek or
14 call for the production of documents or information that is already in the possession, custody, or
15 control of Defendants.

16 3. Tech Data objects to the Requests for Production to the extent that they seek or
17 call for the production of documents or information that can equally or more readily be obtained
18 by Defendants from public sources.

19 4. Tech Data objects to the Requests for Production to the extent that they seek or
20 call for the production of documents or information that can more readily, conveniently, and in a
21 less burdensome fashion be obtained by Defendants from others.

22 5. Tech Data objects to the Requests for Production to the extent that they seek or
23 call for the production of documents or information not in Tech Data’s possession, custody, or
24 control.

25 6. Tech Data objects to the Requests for Production to the extent that they seek or
26 call for the production of documents or information protected from disclosure by the attorney-
27 client privilege, the attorney work product doctrine, or any other privilege, protection, or
28 immunity applicable under the governing law. Any information disclosed pursuant to the

1 Subject to and without waiving its General Objections and the foregoing objections, Tech
 2 Data states that documents responsive to this Request, if any, would have been produced to
 3 Defendants in response to prior requests for production (as modified by agreement of the parties)
 4 served by Defendants in this action.

5 **REQUEST NO. 3:**

6 All DOCUMENTS related to when YOU investigated, or attempted to investigate, the
 7 existence of the alleged antitrust conspiracy that is the subject of YOUR COMPLAINT.

8 **RESPONSE TO REQUEST NO. 3:**

9 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
 10 Tech Data further objects to this Request on the grounds that it is overly broad, unduly
 11 burdensome, and oppressive. Tech Data further objects to this Request because it is duplicative
 12 of other discovery requests, in whole or in part, made by other defendants in this matter, in
 13 violation of the integration order included in section XV, subsections D and E of the Court's
 14 "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012.
 15 Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
 16 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
 17 1128. Tech Data further objects to the extent that this request calls for information that is
 18 covered by attorney-client privilege or the work product protection. Tech Data further objects
 19 to this Request to the extent that it calls for the production of documents or information not
 20 relevant, material or necessary to this action and, thus, not reasonably calculated to lead to the
 21 discovery of admissible evidence.

22 **REQUEST NO. 4:**

23 All DOCUMENTS related to when YOU learned of the existence of the alleged antitrust
 24 conspiracy that is the subject of YOUR COMPLAINT.

25 **RESPONSE TO REQUEST NO. 4:**

26 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
 27 Tech Data further objects to this Request on the grounds that it is overly broad, unduly
 28 burdensome, and oppressive. Tech Data further objects to this Request because it is duplicative

1 of other discovery requests, in whole or in part, made by other defendants in this matter, in
 2 violation of the integration order included in section XV, subsections D and E of the Court's
 3 "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012.
 4 Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
 5 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
 6 1128. Tech Data further objects to the extent that this request calls for information that is
 7 covered by attorney-client privilege or the work product protection. Tech Data further objects to
 8 this Request to the extent that it calls for the production of documents or information not
 9 relevant, material or necessary to this action and, thus, not reasonably calculated to lead to the
 10 discovery of admissible evidence.

11 **REQUEST NO. 5:**

12 All DOCUMENTS related to estimates of the production capacity, output, and/or prices
 13 charged by the DEFENDANTS for CRTs and/or CRT Products during the Relevant Period.

14 **RESPONSE TO REQUEST NO. 5:**

15 Tech Data refers to and incorporates its General Objections as if set forth fully herein.
 16 Tech Data further objects to this Request on the grounds that it is overly broad, unduly
 17 burdensome, and oppressive. Tech Data further objects to this Request because it is duplicative
 18 of other discovery requests, in whole or in part, made by other defendants in this matter, in
 19 violation of the integration order included in section XV, subsections D and E of the Court's
 20 "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012.
 21 Order Re Discovery and Case Management Protocol, In re Cathode Ray Tube Antitrust
 22 Litigation, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No.
 23 1128. Tech Data further objects to this Request to the extent that it calls for the production of
 24 documents or information equally available to Defendants. Tech Data further objects to this
 25 Request to the extent that it calls for the production of documents or information not relevant,
 26 material or necessary to this action and, thus, not reasonably calculated to lead to the discovery
 27 of admissible evidence.

1 case on an incomplete record and review and analyze all information obtained in discovery thus
2 far at this stage of this litigation, many months before the agreed-upon fact discovery deadline.
3 Tech Data also objects to this Request to the extent that it calls for the production of documents
4 or information not relevant, material or necessary to this action and, thus, not reasonably
5 calculated to lead to the discovery of admissible evidence.

6 Subject to and without waiving its General Objections and the foregoing objections, Tech
7 Data states that it will comply with its obligations under the Federal Rules of Civil Procedure.

8
9 Dated: July 10, 2014

By:

/s/Scott N. Wagner

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Pages 311 – 341 Filed Under Seal